

EXHIBIT E

Deposition of Al Bradley

Part II

<p style="text-align: right;">113</p> <p>1 have been more than likely one of 2 the three people that were working 3 that night. 4 Q. And it's got two two five 5 six in B block. And then down 6 below it's got -- under fourteen 7 ninety-five it's got two two five 8 two. Is that another one of the 9 jailers? 10 A. Yes, sir. All of the 11 jailers' numbers will start with 12 the number twenty-two. That's for 13 designation for the County. 14 Q. For the camera? 15 A. County. 16 Q. For the County? 17 A. Yes, sir. 18 Q. And what was your number? 19 A. Twenty-two fifteen at the 20 time. 21 Q. Twenty-two fifteen? 22 A. Yes, sir. 23 Q. Has it changed?</p>	<p style="text-align: right;">115</p> <p>1 It says the tower log but it gives 2 three people's names. So I don't 3 know who was assigned to the tower. 4 Q. Would someone other than 5 the person in the tower answer the 6 intercom? 7 A. No. The intercom rings 8 upstairs in the tower. 9 Q. So it says, when 10 twenty-two fifty-three answered the 11 first time, that would be the 12 person in the tower? 13 A. Yes, sir. 14 Q. Okay. 15 A. I would assume so the way 16 it's written. 17 Q. And -- what is your number 18 now? 19 A. Twenty-two twenty-one. 20 Q. Why was it changed? 21 A. I was put down as -- 22 instead of being -- the sheriff 23 came up with a new deputy list of</p>
<p style="text-align: right;">114</p> <p>1 A. Yes, sir. 2 Q. When did it change? 3 A. About -- since -- when 4 Sheriff Wilson came in office. 5 Q. And looking down there at 6 the bottom of the page there is an 7 entry without a date. It says, Lee 8 had repeatedly pushed the intercom 9 button. When twenty-two 10 fifty-three answered the first time 11 Lee stated they needed grievance 12 forms. 13 Who is Lee? 14 A. Lee would probably have 15 been an inmate and that would have 16 been his last name. 17 Q. And you don't know who 18 twenty-two fifty-three is? 19 A. No, sir. 20 Q. Would that have been the 21 person in the tower? 22 A. I don't know. I don't 23 know who was working in the tower.</p>	<p style="text-align: right;">116</p> <p>1 arresting officers and those that 2 do not work the road were assigned 3 a different number. And I just was 4 assigned twenty-two twenty-one. 5 Q. Now, I understand that 6 there are eight deputies? 7 A. Yes, sir, I believe so, 8 that work the road. 9 Q. And how many jailers now? 10 A. Right off the top of my 11 head I don't know. I'd have to sit 12 down and go through the list. Some 13 of them I don't even know by their 14 last name. I would have to sit 15 down and think. I would say 16 somewhere around ten. But I -- 17 therefore I'm guessing. I don't 18 know exactly how many we've got on 19 staff now. 20 Q. How many jailers are there 21 on day shift when you are working? 22 A. Normally two, me and one 23 other person.</p>

29 (Pages 113 to 116)

<p>117</p> <p>1 Q. And how many jailers are 2 on night shift? 3 A. Normally two. Unless 4 something else is up. I don't -- 5 it varies. 6 Q. Now -- so when the -- 7 there are two of you on the two of 8 you are responsible for keeping the 9 respective logs? 10 A. Yes, sir. 11 Q. That you don't sign off 12 on? 13 A. No, sir. 14 Q. And are they maintained in 15 the computer? 16 A. Yes, sir. 17 Q. And so there is a hard 18 copy and a computer copy? 19 A. Should be, yes, sir, if 20 they saved it. I -- 21 Q. Now, who is responsible 22 for doing the computer work? 23 A. Computer work?</p>	<p>119</p> <p>1 A. Yes, sir. 2 Q. And I noticed that that's 3 a keyed entry. 4 A. Yes, sir. 5 Q. And it's different from 6 the entry up to the -- where you 7 have to push a button to get in. 8 A. Yes, sir. 9 Q. Are there some rooms that 10 have keyed entries and some that 11 have exam -- that you have to push 12 and go through the tower? 13 A. Yes, sir. 14 Q. Are the rooms that are in 15 the holding area different from -- 16 say, the big cell because they -- 17 some of them are keyed and some of 18 them are not? 19 A. Yes, sir. Those -- the 20 holding cells have a key entry, a 21 large key, yes, sir. 22 Q. And the -- I noticed that 23 there is also an isolation unit</p>
<p>118</p> <p>1 Q. Yeah, backing up the saved 2 logs and the saved reports and -- 3 A. I don't have any idea. 4 Q. Now, I understood that the 5 booking room also did the dispatch; 6 is that right? 7 A. Yes, sir. It's all in the 8 same room. 9 Q. And the -- has that 10 changed? 11 A. No, sir. 12 Q. Now, dispatch means 13 communicating with the deputies on 14 the road? 15 A. Yes, sir. 16 Q. Is there a microphone that 17 you man and -- 18 A. Yes, sir. 19 Q. Now, I just took a jail 20 tour. I noticed that there are 21 some -- for example, there is an 22 exam room that's right next to the 23 holding cell.</p>	<p>120</p> <p>1 where there are two isolation 2 cells. Were there two isolation 3 cells when -- back in the 2003, 4 2004 time period? 5 A. Those were designated as 6 trustee cells. 7 Q. They were designated as 8 trustee cells? 9 A. Yes, sir. 10 Q. Then they had -- so they 11 weren't used as isolation cells at 12 the time? 13 A. No, sir. 14 Q. They had a shower in them 15 and they looked to be about eight 16 by ten; is that right? 17 MS. McDONALD: If you 18 know. 19 A. I don't know what the 20 measurements of them are. 21 Q. How many trustees were 22 there at any one time? 23 A. That also varied depending</p>

30 (Pages 117 to 120)

<p style="text-align: right;">121</p> <p>1 on what they needed or what the 2 jail administration needed them 3 for. We don't have any control 4 over trustees as far as how many is 5 assigned. 6 Q. Who does? 7 A. The jail administrator and 8 the sheriff. 9 Q. How many trustees are 10 there now? 11 A. Five, I believe. 12 Q. And what's the most number 13 of trustees you can remember? 14 A. Sir, I don't remember. 15 Q. What's the least number 16 you can remember? 17 A. Maybe three. 18 Q. And -- now, in filling out 19 this log what were you supposed to 20 put on here? 21 A. Whatever you felt was 22 important that happened during your 23 shift.</p>	<p style="text-align: right;">123</p> <p>1 talking about? 2 Q. About -- were you ever 3 told that you had to write an 4 incident report for anything? 5 A. We have a form that if 6 there is an incident that happens 7 with an inmate or that we have to 8 have any type of disciplinary or 9 there's some kind of use of force 10 we'd have forms for that. 11 Q. And when you say -- what 12 sort of a form are you -- 13 A. It's just a form that -- 14 it says, incident report, on there 15 and it has to do with the inmates 16 and just asks questions about what 17 happened and who was involved and 18 what took place. 19 Q. Is it a computerized form? 20 A. I don't know whether it's 21 -- was put up by a computer or not. 22 Q. Did you -- 23 A. I don't -- I didn't -- I</p>
<p style="text-align: right;">122</p> <p>1 Q. No guidelines, just 2 whatever you felt was important? 3 A. Yes, sir. There was -- 4 you had a jail count. Normally it 5 would be put on the front of the 6 shift, a jail count at the end of 7 the shift, and whatever happened 8 during your shift. 9 Q. And were you supposed to 10 log it as it happened or were you 11 supposed to, when you finished up 12 something, go back and put it in 13 there? 14 A. There is no written policy 15 but I always put it down when it 16 happened, as close to the time as I 17 could get it. I don't know what -- 18 I don't know what anybody else 19 does. 20 Q. Were you ever required to 21 write incident reports? 22 A. Incident reports as -- 23 what type incident report are you</p>	<p style="text-align: right;">124</p> <p>1 don't have the form -- I don't have 2 anything to do with the form 3 printing. 4 Q. Did you ever fill out an 5 incident report? 6 A. Have I ever filled one 7 out? 8 Q. Yes, sir. 9 A. Yes, sir. 10 Q. Do you know what -- can 11 you tell me -- what did I do with 12 that page? 13 Looking at this tower 14 report I see in this group which 15 begins in my case on January 2nd, 16 2004 -- 17 MS. McDONALD: Are you 18 looking at a night shift tower log? 19 MR. STOCKHAM: Well, it's 20 consecutive with -- the top one is 21 a night shift but the next one -- 22 MS. McDONALD: Okay. 23 MR. STOCKHAM: -- is the</p>

31 (Pages 121 to 124)

<p style="text-align: right;">125</p> <p>1 day shift's tower log. 2 Q. (By Mr. Stockham) Some of 3 these are in different fonts. Who 4 chooses the font? 5 A. The person that starts the 6 log. 7 Q. Like on 1-5-04, tower log, 8 Calfee, Bradley, that would be a 9 shift that you were on? 10 A. Yes, sir. 11 Q. Who would have chosen that 12 font? 13 A. Normally mine are written 14 in the same case as the top. So -- 15 because I like big writing and I do 16 my whole log that way ninety-nine 17 percent of the time. So I did not 18 choose that font so that would have 19 been Calfee's. 20 Q. And looking over on 1-6 21 tower log on day shift, do you know 22 whose log that would be? 23 A. I really don't know. But</p>	<p style="text-align: right;">127</p> <p>1 him back to the back? 2 A. That's what we were told 3 to do. 4 Q. Who told you to do that? 5 A. Wendy Roberson. 6 Q. And did she tell you where 7 to take him to -- 8 A. Well, he had -- 9 Q. -- get a shower? 10 A. He had a room in B block. 11 He had a cell there and he was 12 escorted back to B block and went 13 in his cell where his toiletries 14 were kept. 15 Q. Well, from about mid 16 December on till the 16th of 17 January he was in the holding cell, 18 wasn't he? 19 A. I don't remember. I don't 20 -- I don't know the dates. I would 21 have to look and -- look at 22 something. I don't remember what 23 dates he was there.</p>
<p style="text-align: right;">126</p> <p>1 there, again, most of mine are 2 always used in the upper case in 3 the big bold print. 4 Q. Looking on this one it 5 says, six fifty-nine hours, razors 6 administered, Kelly escorted back 7 to B block to get a shower. 8 A. Uh-huh. 9 Q. Why would you take Kelly 10 back to B block to get a shower? 11 A. Because that's where his 12 stuff was, in his room. And he 13 would also use the phone when he 14 was back there. He was up front 15 and when he wanted a shower we'd 16 take him to the back. 17 Q. There was a shower right 18 there at the front, wasn't there? 19 A. Yes, sir. 20 Q. Why -- 21 A. There's one in the exam 22 room. 23 Q. Right. Why would you take</p>	<p style="text-align: right;">128</p> <p>1 Q. Well, do you know of 2 anyone that's ever been kept in the 3 holding cell for as long as Mr. 4 Kelly has been kept in the holding 5 cell? 6 A. I don't know exactly how 7 long he was kept in the holding 8 cell. I don't. 9 Q. So who told you that Mr. 10 Kelly was going to be kept in the 11 holding cell? 12 A. When I -- I don't remember 13 how or when he was put in the 14 holding cell and I don't know who 15 made that decision. 16 Q. Now, I've been given a 17 copy of -- 18 (Whereupon, an 19 off-the-record 20 discussion was held.) 21 Q. (By Mr. Stockham) Well, 22 for example, on this payroll 23 summary, it shows for the week of</p>

32 (Pages 125 to 128)

129

1 January -- or December 27 through
2 January 9th. Did you fill out
3 those hourly entries on there?
4 A. On here (indicating)?
5 Q. Yes, sir.
6 A. No, sir.
7 Q. Someone in the payroll
8 department did that?
9 A. That's done by the
10 secretary.
11 Q. It shows here that you
12 worked on the 27th, 28th, 31st and
13 the 1st?
14 A. Yes, sir, that's what it
15 shows.
16 Q. And then it shows you
17 worked on the 5th and 6th. And
18 then --
19 A. Yes, sir.
20 Q. And then it looks like you
21 had a vacation --
22 A. Yes, sir.
23 Q. -- on the 9th --

130

1 A. Yes, sir.
2 Q. -- is that right?
3 A. Yes, sir.
4 Q. And then the next week it
5 shows you had vacation; is that
6 right?
7 A. Yes, sir.
8 Q. And the previous occasion
9 it shows that you worked from -- on
10 the 13th and the 14th and the 17th
11 and the 18th; is that right?
12 A. That's what it shows, yes,
13 sir.
14 Q. And then it shows you
15 worked on the 22nd, 23rd, 25th and
16 26th?
17 A. Yes, sir. That's what it
18 -- I believe that's what it's
19 showing, yes, sir.
20 Q. And there's an H --
21 A. That's the holiday.
22 Q. So you got paid overtime
23 for -- because it was a holiday?

131

1 A. Yes, sir.
2 Q. And then it shows that you
3 worked November 29th and 30th,
4 December 3rd and December 4th?
5 A. That's what it shows, yes,
6 sir.
7 Q. And it shows that you
8 worked the 8th, 9th and the 12th --
9 A. That's what it shows --
10 Q. -- in December?
11 A. -- there, yes, sir.
12 Q. Do you have any reason not
13 to think that those might -- those
14 are not correct?
15 A. I don't have any reason,
16 no, sir.
17 Q. Do you have any
18 independent recollection of this
19 time frame?
20 A. No, sir.
21 Q. Do you --
22 A. Not -- no, sir.
23 Q. Do you have any notes

132

1 about what occurred other than the
2 jail logs and tower reports that we
3 have?
4 A. None whatsoever.
5 Q. Looking at Exhibit Two
6 over on the day entry for 1-12-04.
7 A. Okay.
8 Q. We look down midway and it
9 says, twelve sixteen hours.
10 A. Okay.
11 Q. Hawkins moved back to
12 detox. What is detox?
13 A. That's the holding cell.
14 Q. Which one?
15 A. I don't know.
16 MR. STOCKHAM: Mark these
17 as Exhibit --
18 MR. WILLFORD: I've got
19 the --
20 MR. STOCKHAM: Oh, okay.
21 MR. WILLFORD: -- copies
22 over there --
23 MR. STOCKHAM: Great.

<p style="text-align: right;">133</p> <p>1 MR. WILLFORD: -- for you 2 to mark. 3 MR. STOCKHAM: Mark those 4 as Exhibit Three. 5 (Whereupon, Plaintiff's 6 Exhibit Three 7 was marked for 8 identification.) 9 Q. (By Mr. Stockham) Let me 10 show you what I've been produced. 11 It is a series of documents that 12 I'm going to mark as group Exhibit 13 Four. 14 (Whereupon, Plaintiff's 15 Exhibit Four 16 was marked for 17 identification.) 18 MR. STOCKHAM: Actually -- 19 are these in the jail file, these 20 inmate request forms? 21 MS. McDONALD: Uh-uh. 22 MR. STOCKHAM: Why don't 23 you show them to him if you would</p>	<p style="text-align: right;">135</p> <p>1 fill that out. That's a way of 2 communication between the inmates 3 and the jail personnel. 4 Q. I notice there is a series 5 of blanks, medical, commissary, 6 grievance, and other. 7 A. Yes, sir. 8 Q. Well, what do those relate 9 to? 10 A. If they have a medical 11 problem or if they want something 12 out of the commissary, if they want 13 to complain about something or mark 14 other. 15 Q. How would they get these 16 forms? 17 A. They are passed out -- 18 when they request them then they're 19 handed out to the inmates, by the 20 jail staff. 21 Q. Looking -- 22 (Whereupon, an 23 off-the-record</p>
<p style="text-align: right;">134</p> <p>1 so he can look at the originals. 2 (Whereupon, an 3 off-the-record 4 discussion was held.) 5 MS. McDONALD: Ours may 6 not be as together as yours may be. 7 So -- 8 MR. STOCKHAM: Okay. 9 MS. McDONALD: -- bear 10 with him. 11 MR. STOCKHAM: That's not 12 a problem. 13 MS. McDONALD: Please. 14 MR. STOCKHAM: I have put 15 mine in a certain -- in a 16 chronological order. 17 Q. (By Mr. Stockham) First 18 of all, what are these? 19 A. These are inmate request 20 forms. 21 Q. And what are they for? 22 A. Well, they -- whatever 23 their needs or questions are, they</p>	<p style="text-align: right;">136</p> <p>1 discussion was held.) 2 Q. (By Mr. Stockham) Down in 3 the bottom half it's got a -- it 4 says, do not write below, for reply 5 only. Is that where someone would 6 respond? 7 A. Yes, sir. 8 Q. Like on the grievance 9 dated November 29th, is that a 10 response that you wrote? 11 A. Yes, sir. 12 Q. It says, the sheriff will 13 not be in until 12-1-03? 14 A. Yes, sir. 15 Q. And who gets to see this 16 form when it's filled out? 17 A. Well, once it's filled out 18 then this form is put back in the 19 box and then it's -- the jail 20 administrator reviews the form. 21 And then we make sure that when 22 this is filled out that we give a 23 response back to the inmate as to</p>

34 (Pages 133 to 136)

<p style="text-align: right;">137</p> <p>1 what his question was. 2 Q. A written response or a 3 verbal response? 4 A. A verbal response. 5 Q. And you write your written 6 response down here and give it -- 7 A. And then -- 8 Q. -- to the administrator? 9 A. Yes, sir. It's put in a 10 -- there was an inbox there that 11 they're put in. 12 Q. And at this time it would 13 have been Wendy Roberson or Terry 14 Wilson? 15 A. Would have seen it, yes. 16 Q. Would it go to the 17 sheriff? 18 A. Well, normally no. It's 19 handled by the immediate 20 supervisor. Now, what they -- 21 normally they gave the response or 22 they would deliver a message to the 23 sheriff if that's what it was. But</p>	<p style="text-align: right;">139</p> <p>1 And then there is another one, 2 looks like twenty oh five, marked, 3 grievance. 4 MS. McDONALD: Yeah, 5 that's it (indicating). 6 A. Okay. 7 MS. McDONALD: Okay. 8 Q. Is that your writing on 9 both of those? 10 A. Yes, sir. 11 Q. Do you have any 12 recollection of filling those out? 13 A. I don't remember writing 14 them out but, you know, reading it, 15 then I know what it's about. 16 Q. And did you respond to him 17 verbally with those answers? 18 A. Yes, sir. 19 Q. On the one on 12 -- or it 20 looks like there's a response from 21 BS. Who is BS? On 12-21-03 is the 22 response. 23 A. 12-21. That's 12-10.</p>
<p style="text-align: right;">138</p> <p>1 I'm just -- it was given to the 2 jail administrator and then we 3 didn't see it anymore, not the 4 paperwork itself. 5 Q. And looking through here I 6 see responses initialed KSH. Who 7 was that? 8 A. That would be Kenneth 9 Steve Hay. 10 Q. And would he have given 11 the verbal response to the -- to 12 Mr. Kelly about this or would that 13 just be his note? 14 A. That I can't answer. 15 Q. Looking on 12-18. 16 (Whereupon, an 17 off-the-record 18 discussion was held.) 19 Q. (By Mr. Stockham) There 20 are actually two. One is -- shows 21 a time of ten o'clock. 22 A. Okay. 23 Q. And it's marked, medical.</p>	<p style="text-align: right;">140</p> <p>1 12-7 -- 2 Q. I'll just show you what 3 I've got and see if you can tell me 4 who that response is from. 5 (Witness examining 6 documents.) 7 A. I don't know. 8 Q. You don't know who BS is? 9 A. No, sir, not -- I don't. 10 MS. McDONALD: That's -- 11 THE WITNESS: I don't see 12 it. 13 MS. McDONALD: Let's 14 see -- 15 Q. There's an entry on 1-6. 16 There's actually no time on it but 17 the answer is on 1-6. 18 MS. McDONALD: Well -- 19 Q. Appointment will be made. 20 Is that your response (indicating)? 21 MS. McDONALD: Give us a 22 second. 23 A. I don't have it --</p>

35 (Pages 137 to 140)

<p style="text-align: right;">141</p> <p>1 MS. McDONALD: Hang on. 2 Q. Well, let me show you. Is 3 that your response? 4 A. Yes, sir. 5 Q. Now, you say you -- when 6 you would fill this out you would 7 put it in a box? 8 A. Yes, sir. When we 9 received the form we would make the 10 reply, fill that form out at the 11 bottom and place it in the inbox 12 for the supervisor. 13 Q. Where is in the inbox? 14 A. The inbox was located 15 there in the booking room. 16 Q. Now, are you aware of any 17 other lawsuits that have been filed 18 against the Coosa County Jail while 19 you have been an employee there? 20 A. There has been mention of 21 several lawsuits, yes, sir. 22 Q. Which lawsuits have been 23 mentioned?</p>	<p style="text-align: right;">143</p> <p>1 A. I believe his last name 2 was Stroud. 3 Q. And were you working at 4 the time that he died? 5 A. No, sir, I was not. 6 Q. Do you know what the 7 circumstances were surrounding his 8 death? 9 A. No, sir, I was off. 10 Q. Has anyone told you what 11 the circumstances were? 12 A. No, sir. 13 Q. Anyone else suffered any 14 injury in the jail that you're 15 aware of? 16 MS. McDONALD: Inmates? 17 Q. Inmates. 18 A. There is some that have 19 fallen or hurt their self. But 20 names, I don't know. 21 Q. When did Mr. Stroud die? 22 A. I don't know the year. 23 Q. Now, do you socialize with</p>
<p style="text-align: right;">142</p> <p>1 A. Those -- 2 MS. McDONALD: If you 3 know. 4 THE WITNESS: Do what, 5 ma'am? 6 MS. McDONALD: If you 7 know. If you don't know, don't 8 worry about it. 9 A. No. Personally, no, I do 10 not know. 11 Q. (By Mr. Stockham) Have 12 you been told of any other 13 lawsuits? 14 A. I've just heard that there 15 may be another lawsuit. But I 16 don't know who it's for or what 17 it's about. 18 Q. Are you aware of anyone 19 who has died while at -- as an 20 inmate at the Coosa County Jail 21 while you have been working there? 22 A. Yes, sir. 23 Q. Who is that?</p>	<p style="text-align: right;">144</p> <p>1 any of the jail staff outside of 2 work? 3 A. No, sir. 4 Q. Have you ever been 5 disciplined -- 6 A. No, sir. 7 Q. -- during your employment 8 at the jail? 9 A. No, sir. 10 Q. Have you ever had any 11 complaints about your work at the 12 jail? 13 A. No, sir. 14 Q. Or anyone ever complain 15 that you are drinking on the job? 16 A. That's been rumored, yes, 17 sir, it has. 18 Q. Who has rumored -- 19 A. Inmates. 20 Q. Anyone else? 21 A. No, sir. 22 Q. Anyone in the jail 23 administration spoken to you about</p>

36 (Pages 141 to 144)

<p style="text-align: right;">145</p> <p>1 it?</p> <p>2 A. Bill Evans brought it up</p> <p>3 one time and I voluntarily took a</p> <p>4 breath test which turned out to be</p> <p>5 point zero zero zero. There was no</p> <p>6 alcohol in my system.</p> <p>7 Q. Have you ever been treated</p> <p>8 for drinking?</p> <p>9 A. No, sir.</p> <p>10 Q. Or alcohol?</p> <p>11 A. No, sir.</p> <p>12 Q. Have -- Sheriff Owens ever</p> <p>13 have any complaints with you about</p> <p>14 drinking?</p> <p>15 A. No, sir.</p> <p>16 Q. Never had -- ever had</p> <p>17 anyone else speak to you about your</p> <p>18 drinking on the job --</p> <p>19 A. No, sir.</p> <p>20 Q. -- who is an employee of</p> <p>21 the sheriff's department?</p> <p>22 A. No, sir.</p> <p>23 Q. Now, in this lawsuit Mr.</p>	<p style="text-align: right;">147</p> <p>1 with something?</p> <p>2 A. Certainly.</p> <p>3 Q. Mr. Kelly said that you</p> <p>4 have grabbed him by the mustache</p> <p>5 and told him to shave it off. Do</p> <p>6 you have any recollections of that?</p> <p>7 A. No, sir.</p> <p>8 Q. Now, you are the person</p> <p>9 who can determine whether or not he</p> <p>10 was going to get to have</p> <p>11 visitation, though, weren't you?</p> <p>12 A. Yes, sir. The regulations</p> <p>13 says that they would be clean</p> <p>14 shaven.</p> <p>15 Q. And so you are the person</p> <p>16 that can refuse him visitation if</p> <p>17 he doesn't shave it, according to</p> <p>18 what you say, right?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Have you ever let people</p> <p>21 have mustaches in the jail?</p> <p>22 A. No, sir. Let me refrain</p> <p>23 that. They have a mustache but</p>
<p style="text-align: right;">146</p> <p>1 Kelly has accused you of several</p> <p>2 things. I want to go through his</p> <p>3 accusations and have you respond to</p> <p>4 them if you will.</p> <p>5 A. Sure.</p> <p>6 Q. He has accused you of</p> <p>7 hitting him on several occasions.</p> <p>8 Have you ever struck Mr. Kelly?</p> <p>9 A. No, sir.</p> <p>10 Q. Now, do you ever have</p> <p>11 deputies come back into the jail</p> <p>12 while you are working there?</p> <p>13 A. Yes, sir, they have.</p> <p>14 Q. And is it a common</p> <p>15 practice during day shift for the</p> <p>16 deputies to come back in there?</p> <p>17 A. Well, they come back into</p> <p>18 the booking area.</p> <p>19 Q. Yes, sir.</p> <p>20 A. They have been in the</p> <p>21 booking area, yes, sir. They --</p> <p>22 Q. Have you ever had deputies</p> <p>23 come back to give you assistance</p>	<p style="text-align: right;">148</p> <p>1 they won't -- they would not get --</p> <p>2 they would not get visitation</p> <p>3 according to the jail policy. But,</p> <p>4 yes, they're allowed to have a</p> <p>5 mustache.</p> <p>6 Q. And is that a written</p> <p>7 policy?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Have you ever refused</p> <p>10 anyone else visitation because they</p> <p>11 had a mustache?</p> <p>12 MS. McDONALD: Object to</p> <p>13 the form. I don't think he said</p> <p>14 he'd refused him a visitation.</p> <p>15 Q. Have you ever refused</p> <p>16 anyone because they had a mustache?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can you give me the names</p> <p>19 of people who you refused?</p> <p>20 A. No, sir, I cannot.</p> <p>21 Q. Did you refuse Mr. Kelly</p> <p>22 visitation --</p> <p>23 A. I don't have any</p>

37 (Pages 145 to 148)

<p style="text-align: right;">149</p> <p>1 recollection of that.</p> <p>2 Q. -- if he didn't shave his</p> <p>3 mustache?</p> <p>4 A. If he had a mustache then</p> <p>5 I probably would have not given him</p> <p>6 visitation.</p> <p>7 Q. Now, Mr. Kelly has accused</p> <p>8 you of kicking him in the ribs.</p> <p>9 Have you ever kicked Mr. Kelly in</p> <p>10 the ribs?</p> <p>11 A. No, sir.</p> <p>12 Q. Now, have you -- you --</p> <p>13 when he was in the holding cell you</p> <p>14 would be the jailer who would have</p> <p>15 access to that cell when you were</p> <p>16 working in the area; is that right?</p> <p>17 A. Yes, sir, I would have</p> <p>18 access.</p> <p>19 Q. And you could go in and</p> <p>20 out with the key?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And unless there was</p> <p>23 someone else in the booking room it</p>	<p style="text-align: right;">151</p> <p>1 one that rides low on your -- on</p> <p>2 the leg?</p> <p>3 A. They had -- there is -- at</p> <p>4 one time some of the deputies wore</p> <p>5 a thigh holster on the outside. It</p> <p>6 was sort of a combat type thing.</p> <p>7 Q. Who wore those?</p> <p>8 A. As far as I remember all</p> <p>9 the deputies had one.</p> <p>10 Q. Have you ever hear --</p> <p>11 heard that referred to as a</p> <p>12 speed --</p> <p>13 A. No, sir.</p> <p>14 Q. -- holster?</p> <p>15 Mr. Kelly says that you</p> <p>16 attempted to kick him in the</p> <p>17 testicles. Has anyone ever accused</p> <p>18 you of attempting to kick them in</p> <p>19 the testicles before?</p> <p>20 A. No, sir.</p> <p>21 Q. Did you attempt to kick</p> <p>22 Mr. Kelly in the testicles?</p> <p>23 A. No, sir.</p>
<p style="text-align: right;">150</p> <p>1 would just be you, right?</p> <p>2 A. That's correct.</p> <p>3 Q. And anyone ever accuse you</p> <p>4 of kicking an inmate other than Mr.</p> <p>5 Kelly?</p> <p>6 A. No, sir.</p> <p>7 Q. He says that you kicked</p> <p>8 him in the face and broke his</p> <p>9 teeth. Have you ever kicked him in</p> <p>10 the face?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you ever struck him</p> <p>13 in the face?</p> <p>14 A. No, sir.</p> <p>15 Q. Do you know a deputy who</p> <p>16 wears a speed holster?</p> <p>17 A. I don't know what you mean</p> <p>18 as a speed holster.</p> <p>19 Q. Do you know what a -- you</p> <p>20 don't know what a speed holster is?</p> <p>21 A. No, sir.</p> <p>22 Q. Do you know -- a holster</p> <p>23 that's not a standard holster but</p>	<p style="text-align: right;">152</p> <p>1 Q. Mr. Kelly says that you</p> <p>2 stuck a broom -- and tried to</p> <p>3 insert it in his rectum. Did you</p> <p>4 do that?</p> <p>5 A. No, sir.</p> <p>6 Q. Mr. Kelly says that you</p> <p>7 slapped him in the face. Have you</p> <p>8 ever slapped any inmates?</p> <p>9 A. No, sir.</p> <p>10 Q. Never?</p> <p>11 A. Never.</p> <p>12 Q. Under any provocation?</p> <p>13 A. None whatsoever.</p> <p>14 Q. He says that you took away</p> <p>15 his toilet paper. Did you take</p> <p>16 away Mr. Kelly's toilet paper?</p> <p>17 A. No, sir.</p> <p>18 Q. Mr. Kelly had used toilet</p> <p>19 paper to wrap his feet in. Did you</p> <p>20 have any complaints about Mr. Kelly</p> <p>21 wrapping his feet in toilet paper?</p> <p>22 A. I don't remember that.</p> <p>23 Q. Mr. Kelly says that you</p>

38 (Pages 149 to 152)

<p style="text-align: right;">153</p> <p>1 told him that he had to sleep on 2 the floor. Is that true? 3 A. No, sir. 4 Q. You're not aware of Mr. 5 Kelly sleeping on the floor? 6 A. No, sir, I'm not aware of 7 that at all. 8 Q. You're not aware of Mr. 9 Kelly being forced to put whatever 10 mat he had down on the floor next 11 to the drain? 12 A. No, sir. 13 Q. Do you remember Mr. Kelly 14 being in the holding cell? 15 A. Yes, sir, I remember him 16 being there. 17 Q. You don't remember his 18 mattress being on the floor? 19 A. No, sir, I don't. 20 Q. Mr. Kelly says that you 21 took away his letters. Did you 22 take away Mr. Kelly's letters? 23 A. No, sir.</p>	<p style="text-align: right;">155</p> <p>1 A. They have hoses that they 2 would -- has been used to wash out 3 a holding cell. They've washed the 4 kitchen floor down. They've washed 5 cars with them. 6 Q. Where do you get -- where 7 does the hose hook up to wash out 8 the holding cell? 9 A. I've never watched them 10 wash it out. I just know that 11 they've used a hose. There is a -- 12 a supply room type entrance right 13 beside the exam room and there may 14 be a water spigot there. But 15 the -- 16 Q. You don't know? 17 A. No, sir, I don't. I don't 18 -- I have no reason to go in there. 19 Q. Mr. Kelly says that the 20 temperature in the holding cell was 21 always very cold. Did Mr. Kelly 22 complain to you about the 23 temperature in the holding cell?</p>
<p style="text-align: right;">154</p> <p>1 Q. Mr. Kelly says that you 2 would give him pills that were not 3 his regular pills. Did you ever 4 give Mr. Kelly pills that were not 5 his regular pills? 6 A. No, sir. 7 Q. Mr. Kelly says that you 8 gave him pills that were not during 9 regular pill time. Did you give 10 him pills that were pills -- not 11 during his regular pill time? 12 A. No, sir. 13 Q. Mr. Kelly says you struck 14 him with a hose pipe. Have you 15 ever struck anyone in the jail with 16 a hose pipe? 17 A. No, sir. 18 Q. Is there a hose pipe or 19 something like it used for any 20 purpose in the jail? Do you have 21 a -- 22 A. They -- 23 Q. -- hose at the jail?</p>	<p style="text-align: right;">156</p> <p>1 A. Not that I recall. 2 Q. Mr. Kelly says that he 3 begged repeatedly for you to flush 4 the holding cell and that it was 5 not flushed. Do you have any 6 recollection of flushing the 7 holding cell when Mr. Kelly was in 8 there? 9 A. Yes, I do. 10 Q. I don't -- 11 A. I remember at any time we 12 have anybody in there it's done. 13 It's repeated -- we don't go in the 14 cell. When we go in to check or 15 look we go ahead and flush whether 16 it's been used or not. 17 Q. How frequently do you do 18 that? 19 A. I don't -- it just depends 20 on how long they've been in there. 21 Probably two or three times a 22 shift. 23 Q. Is there any log of that?</p>

39 (Pages 153 to 156)

<p style="text-align: right;">157</p> <p>1 A. No, sir.</p> <p>2 Q. Mr. Kelly accused you of</p> <p>3 cracking two of his ribs. Did you</p> <p>4 ever have a physical encounter with</p> <p>5 Mr. Kelly at all?</p> <p>6 A. No, sir.</p> <p>7 Q. Mr. Kelly says that you</p> <p>8 have denied him access to water.</p> <p>9 Did you give Mr. Kelly water?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Would you make a note of</p> <p>12 it when you did?</p> <p>13 A. No, sir.</p> <p>14 Q. How often do you recall</p> <p>15 Mr. Kelly asking you for water?</p> <p>16 A. I don't actually recall</p> <p>17 any per instance. I know that</p> <p>18 water was given during each meal.</p> <p>19 And if they asked for water -- they</p> <p>20 keep a glass and there's a pitcher</p> <p>21 of water that's brought. Now, how</p> <p>22 often it was done, I don't have any</p> <p>23 recollection of that.</p>	<p style="text-align: right;">159</p> <p>1 that true?</p> <p>2 A. No, sir.</p> <p>3 Q. Now, you were never around</p> <p>4 when his cell was washed out? And</p> <p>5 so you don't know whether it was</p> <p>6 washed out or not?</p> <p>7 A. Personally me watching it,</p> <p>8 no, sir.</p> <p>9 Q. Mr. Kelly complained that</p> <p>10 he had bugs in his cell, didn't he?</p> <p>11 A. I don't have any</p> <p>12 recollection of bugs in his cell.</p> <p>13 Q. Mr. Kelly was never let</p> <p>14 out for exercise, was he?</p> <p>15 MS. McDONALD: Object to</p> <p>16 the form. Do you know whether he</p> <p>17 was ever let out for exercise or</p> <p>18 not?</p> <p>19 A. I don't know, no, sir.</p> <p>20 Q. He was never let out while</p> <p>21 you -- on your shift, was he?</p> <p>22 A. Not on my shift that I</p> <p>23 recall. I don't know.</p>
<p style="text-align: right;">158</p> <p>1 Q. Are you saying Mr. Kelly</p> <p>2 kept a glass in the holding cell?</p> <p>3 A. Yes, sir.</p> <p>4 Q. It is -- was it a --</p> <p>5 A. Plastic. Either an eight</p> <p>6 or twelve ounce glass.</p> <p>7 Q. Plastic?</p> <p>8 A. Yes, sir, hard plastic.</p> <p>9 Q. Hard plastic?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Now the styrofoam cup?</p> <p>12 A. No, sir.</p> <p>13 Q. Hard plastic?</p> <p>14 A. Hard plastic.</p> <p>15 Q. Was that a -- one that</p> <p>16 you'd take and wash or was it one</p> <p>17 that --</p> <p>18 A. Yes, sir, they were</p> <p>19 washed.</p> <p>20 Q. Mr. Kelly said that you</p> <p>21 would threaten him that if he said</p> <p>22 anything about you beating him that</p> <p>23 he wouldn't see his parents; is</p>	<p style="text-align: right;">160</p> <p>1 Q. If Mr. Kelly were let out</p> <p>2 for exercise that would be noted in</p> <p>3 the log?</p> <p>4 A. Should have been, yes,</p> <p>5 sir.</p> <p>6 Q. You complained about Mr.</p> <p>7 Kelly's hollering for water, didn't</p> <p>8 you --</p> <p>9 MS. McDONALD: Object to</p> <p>10 the form.</p> <p>11 Q. -- to Mr. Kelly?</p> <p>12 A. Do what now? I'm sorry.</p> <p>13 Q. You told Mr. Kelly to shut</p> <p>14 up when he complained about</p> <p>15 wanting --</p> <p>16 MS. McDONALD: Object to</p> <p>17 the form.</p> <p>18 Q. -- water, didn't you? You</p> <p>19 can answer.</p> <p>20 A. I don't remember any of</p> <p>21 that, no conversation about him</p> <p>22 being refused of any water.</p> <p>23 Q. Well, when Mr. Kelly was</p>

40 (Pages 157 to 160)

161	1 in the holding cell there was no 2 way for him to get water unless you 3 brought it to him, was there? 4 A. That's correct. 5 MS. McDONALD: Unless he 6 brought it -- 7 A. Other than -- 8 MS. McDONALD: -- to him 9 or unless -- 10 A. -- on another shift. 11 MS. McDONALD: -- somebody 12 brought it to him? 13 A. Or somebody. 14 Q. Well, on your shift the 15 only two people that could have 16 brought it to him would have been 17 you or -- 18 A. No, sir. That's not -- 19 Q. -- the person in the 20 tower. 21 A. That's not true. 22 Q. Who else could have 23 brought it to him?	163	1 making these allegations against 2 you, weren't you? 3 A. Yes, sir, I knew of them. 4 Q. Have you gone back and 5 looked to see whether or not there 6 are any records to support your 7 position? Are there any -- 8 A. No, sir. I've had no 9 contact with any of his records. 10 Q. Now, you -- Mr. Kelly 11 complained about bugs, didn't he, 12 all over his cell? 13 MS. McDONALD: Object to 14 the form. Are you aware that he 15 has made any complaints of bugs? 16 A. No. No, sir, I'm not. 17 Q. When was the first time 18 you heard that he complained about 19 bugs being in his cell? 20 A. I don't remember ever 21 hearing about any bugs in his cell. 22 Q. Anyone tell you that Mr. 23 Kelly was suicidal?
162	1 A. Wendy, anybody else that 2 was working on day shift. 3 Q. Well, who else was working 4 on day shift besides you and the 5 other jailer back in the holding 6 area? 7 A. I have no recollection off 8 the top of my head who else would 9 be working. 10 Q. Well, at that time was the 11 -- was Wendy back in the holding 12 area? 13 A. Sir, I don't -- they would 14 be anywhere. I don't know a 15 specific date or time of when this 16 occurred or his saying it occurred. 17 Q. Well, you sat through his 18 deposition and you heard him make 19 these accusations, didn't you? 20 A. I certainly heard most of 21 them, yes, sir. 22 Q. And you were made aware 23 before his deposition that he was	164	1 A. Yes, and I don't remember 2 exactly when. There was -- I 3 believe they had a watch, I 4 believe, that was put on his door 5 for a watch to check him every 6 fifteen minutes at one time. I 7 don't know -- I don't remember it 8 being on my shift but I do know it 9 was -- I heard that it was there or 10 that he was having some problem. 11 Q. Are you aware that a white 12 card was placed over the window in 13 his cell? 14 A. A white card? 15 Q. Yeah, so that he couldn't 16 look out? 17 A. No, sir. I don't remember 18 seeing that, no. 19 Q. With regard to Mr. Kelly's 20 allegation that you struck him it's 21 just your word against his? 22 MS. McDONALD: Object to 23 the form.

41 (Pages 161 to 164)

<p style="text-align: right;">165</p> <p>1 Q. You can answer. 2 A. As far as I know. 3 Q. And that would also be 4 true with regard to his allegation 5 that you kicked him in the teeth? 6 MS. McDONALD: Object to 7 the form. 8 MR. WILLFORD: Object to 9 the form. 10 Q. You can answer. 11 A. Repeat the question again. 12 I'm sorry. 13 Q. Do you have anyone -- 14 A. No, sir, I don't have any 15 proof. I don't. 16 Q. Now, with regard to his 17 allegation that you stuck a broom 18 -- or tried to stick a broom in his 19 rectum, do you have anyone that 20 supports your allegation or your 21 position? 22 A. I've got several that 23 would support my position but --</p>	<p style="text-align: right;">167</p> <p>1 there's a broom in there or not. 2 Q. Did you have any 3 discussions with anyone in the jail 4 about the fact that Mr. Kelly had 5 mental problems? 6 A. No, sir. 7 Q. Now, you knew -- 8 MS. McDONALD: At what 9 point? 10 MR. STOCKHAM: At any 11 point. 12 MS. McDONALD: Has he ever 13 had a discussion? 14 MR. STOCKHAM: Yes. 15 MS. McDONALD: He's been 16 incarcerated several times. Or 17 during -- from November of '03 to 18 January 16th, which is the basis of 19 the complaint, did he ever have a 20 discussion whether he had mental 21 problems? Can we limit it in time? 22 MR. STOCKHAM: Sure. 23 Sure.</p>
<p style="text-align: right;">166</p> <p>1 no, sir, I did not do that. 2 Q. Who would support your 3 position? 4 A. The people that I work 5 with. 6 Q. Who is that? 7 A. Well, the people that were 8 working at the time. 9 Q. Have you talked about it 10 with any of them? 11 A. I have discussed the case 12 with Sheriff Wilson. 13 Q. Anyone else? 14 A. No, sir, I haven't -- 15 other than my attorneys. 16 Q. Do you have -- are there 17 brooms kept in the holding area -- 18 I mean, in the booking area? 19 A. No, sir. 20 Q. Where are the brooms kept? 21 A. There is a utility closet, 22 I think in the hall where the mops 23 are. I can't tell you whether</p>	<p style="text-align: right;">168</p> <p>1 A. Well, according to -- 2 MS. McDONALD: Just wait. 3 Let him limit it in time -- 4 MR. STOCKHAM: Yeah. 5 MS. McDONALD: -- so we 6 can -- 7 Q. (By Mr. Stockham) From 8 the -- from November, 2003, through 9 January 16th, 2004 did you ever 10 discuss with anyone in the jail 11 that Mr. Kelly had mental problems? 12 A. No, sir. 13 Q. You've not told that Mr. 14 Kelly was bipolar? 15 A. Now, I was told that he 16 was bipolar. I didn't discuss his 17 mental condition with anybody 18 because I didn't -- I don't know of 19 his mental condition. 20 Q. Who told you he was 21 bipolar? 22 A. I don't remember. I -- it 23 might have been during medication</p>

42 (Pages 165 to 168)

1310 32nd Street S.
Birmingham, Alabama 35205

205-250-7765
danielreporting@aol.com

<p style="text-align: right;">169</p> <p>1 or I asked what this was for or 2 whatever. I don't -- I just -- I 3 was told. 4 Q. But you don't know by 5 whom? 6 A. No, sir. 7 Q. Well, what do you 8 understand bipolar to mean? 9 A. I don't really know. 10 Q. Do you understand that 11 it's a serious medical condition? 12 MS. McDONALD: Object to 13 the form. 14 A. I wouldn't know whether -- 15 how serious it is, no. 16 Q. Well, is there a doctor 17 that you have that you consult 18 about -- 19 A. Did I consult them? No, 20 sir. 21 Q. Is there a doctor that the 22 jail consulted at that particular 23 time about the degree of severity</p>	<p style="text-align: right;">171</p> <p>1 discussing his personal medical -- 2 Q. Yes. 3 A. No, sir, we didn't -- we 4 don't -- 5 Q. Anyone tell you that he 6 had a medical condition that needed 7 attention? 8 A. Well, everybody knew he 9 had a medical problem because he 10 was taking so many medications or 11 different medications. But, I 12 mean, that was obvious. But to sit 13 down and discuss what each one of 14 them were, no. 15 Q. Did anyone tell you that 16 he had suffered from seizures? 17 A. I heard it. There again, 18 that goes back to the medicine. I 19 never saw him personally have a 20 seizure, no, sir. 21 Q. Who told you that he 22 suffered from seizures? 23 A. All I know that he was --</p>
<p style="text-align: right;">170</p> <p>1 of medical condition? 2 A. I'm not aware of that. 3 MS. McDONALD: Regarding 4 who? 5 MR. STOCKHAM: Regarding 6 the plaintiff. 7 A. I'm not privy to that. I 8 don't discuss -- I don't discuss 9 directly to a doctor. 10 Q. Anyone tell you that they 11 had a doctor -- 12 A. No, sir. 13 Q. -- who discussed it? 14 A. No, sir. 15 Q. Anyone in the jail staff 16 tell you anything about Mr. Kelly's 17 medical condition while -- between 18 he -- when he was taken to the jail 19 in November of 2003 and January, 20 2004? 21 A. I don't understand what 22 the medication condition -- are you 23 talking about us just sitting down</p>	<p style="text-align: right;">172</p> <p>1 had some seizure medicine at one 2 time. That's all I know. 3 Q. Do you know which medicine 4 was the -- 5 A. No, sir -- 6 Q. -- seizure medicine? 7 A. -- I do not. 8 MS. McDONALD: Do you know 9 which period of time he had the 10 seizure medication? 11 THE WITNESS: No, I do 12 not. 13 Q. Do you have a policy in 14 the jail about how to deal with 15 patients who have seizures? 16 A. A policy for seizures? 17 Q. Yes, sir. 18 A. No, sir. I'm not aware of 19 a seizure policy, no, sir. 20 Q. So if someone were to have 21 a seizure and you're on duty this 22 week you wouldn't know what to do? 23 A. Yes, sir. You'd go back</p>

43 (Pages 169 to 172)

173	175
<p>1 there and give medical attention 2 and make sure that they don't hurt 3 their self in the meantime and the 4 ambulance is being notified and 5 medical crew for this area would be 6 sent to the jail. 7 Q. Medical crew? What does 8 that mean? 9 A. That means first 10 responders and the ambulance crew 11 would be called. 12 Q. And who would make a 13 decision then about what was going 14 to be done for emergency -- 15 A. That's left up to the 16 emergency personnel. 17 MR. STOCKHAM: Is this my 18 set of copies here (indicating)? 19 MR. WILLFORD: Yes, sir. 20 Q. Looking at this entry for 21 12-18-03 -- if you'll look at the 22 day shift report. 23 A. Okay.</p>	<p>1 or whatever circumstances, then we 2 have -- we did take them to Pricare 3 to Dr. James' office. 4 MR. STOCKHAM: Okay. I 5 believe that I am done. 6 7 EXAMINATION BY MS. McDONALD: 8 Q. I just -- I have one 9 question for you that I just wanted 10 you to kind of explain to me if you 11 don't mind. Can you explain -- you 12 mentioned something about a blister 13 pack to medicate -- for medication 14 purposes. Can you explain what 15 that is to me, please? 16 A. What we call a blister 17 pack is a sheet with -- with a -- 18 which has got a hard cardboard back 19 and the medication is sealed in a 20 little bubble, plastic bubble. And 21 you break the bubble and push the 22 meds out through the back. But 23 this -- and that's done by the drug</p>
174	176
<p>1 Q. It says eleven ten hours, 2 Kelly back to holding for medical 3 observation till further notice per 4 two two one three and two two oh 5 one. 6 A. That's Wendy and the 7 sheriff. 8 Q. And right above that it 9 says, ten twenty hours, two two oh 10 two took East, Holingquest and 11 Harris to Dr. James. Who is two 12 two oh two? 13 A. I don't -- I don't know 14 who that was. 15 Q. Who was Dr. James? 16 A. Dr. James is a physician 17 at Pricare in Alex City. 18 Q. Is that someone that the 19 jail regularly took people to? 20 A. Sometimes, yes, sir. We 21 had two -- we have two places. One 22 was Dr. Weaver here. And if he 23 wasn't there or couldn't see them</p>	<p>1 store with the doctor's name and 2 your directions on it. And you 3 just -- it's on the top part of it. 4 Q. So what would normally be 5 put in a bottle is on a cardboard 6 sheet with the individually placed 7 medication? 8 A. Yes, ma'am. 9 Q. So you don't have to open 10 a medication bottle, it's on a 11 sheet? 12 A. A blister pack. That's 13 correct. It's in a page, like, and 14 you just pop the bubble. 15 Q. And do y'all use those for 16 the inmates' -- 17 A. Yes. 18 Q. -- medication? 19 A. Yes, ma'am. 20 Q. And the medications that 21 are prescribed by the physicians 22 are filled where? 23 A. Mainly at Crews Drug Store</p>

44 (Pages 173 to 176)

<p style="text-align: right;">177</p> <p>1 right here in 2 Rockford. Sometimes if they take 3 an inmate to Russell Hospital these 4 drug stores are closed on Saturday 5 here. So then a lot of times they 6 fill it at the pharmacy at the 7 hospital to get them by till they 8 can get over here and have it done. 9 Q. And will Crews provide 10 y'all with blister packs? 11 A. Yes. But, now, I don't 12 know how that's done. 13 Q. That's okay. 14 A. I don't have a clue. 15 Q. If you get a prescription 16 filled somewhere else would it also 17 -- like at Russell do they also do 18 blister packs or do they do the 19 medicine bottles? 20 A. I don't know because I 21 haven't seen any in a long time. 22 Q. That's fine. That's fine. 23 MS. McDONALD: That's all</p>	<p style="text-align: right;">179</p> <p>1 CERTIFICATE 2 3 STATE OF ALABAMA) 4 JEFFERSON COUNTY) 5 6 I hereby certify that the above 7 and foregoing deposition was taken 8 down by me in stenotype, and the 9 questions and answers thereto were 10 reduced to typewriting under my 11 supervision, and that the foregoing 12 represents a true and correct 13 transcript of the deposition given 14 by said witness upon said hearing. 15 I further certify that I am 16 neither of counsel nor kin to the 17 parties to the action, nor am I in 18 anyway interested in the result of 19 said cause. 20 21 22 Sandra Peebles Daniel 23 Commissioner</p>
<p style="text-align: right;">178</p> <p>1 I needed. I just needed 2 clarification in my head. Thank 3 you. 4 THE WITNESS: Yes, ma'am. 5 MR. WILLFORD: I have no 6 questions. 7 8 FURTHER THE DEPONENT SAITH NOT 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23</p>	

45 (Pages 177 to 179)

1310 32nd Street S.
Birmingham, Alabama 35205

205-250-7765
danielreporting@aol.com

A	7:22 8:11 19:20 19:22	April 23:20	attempting 151:18	46:2,17 47:11
Aaron 89:15	Alabama 1:2 2:5	area 32:6 33:8,15	attendance 4:14	51:17 52:17
AB 99:8,8	5:12,18,23 7:3,6	33:16,17,20,22,23	attention 171:7	bathrooms 48:4
accepted 102:13	7:11 179:3	34:8 37:7 42:22	173:1	51:8
access 149:15,18	alcohol 145:6,10	43:1,8 45:20 46:8	attorneys 166:15	bear 134:9
157:8	Alex 10:13,14 13:6	46:9,12 51:17	authority 24:18	beating 158:22
accusations 146:3	13:13 14:8,10,15	52:17 55:15,17	automatically	bed 67:17
162:19	15:8 16:22 174:17	58:2 60:3,8,9,11	50:20 62:1	beds 53:19
accuse 150:3	Alexander 10:7	60:21,22 61:16	aware 141:16	bedtime 100:3
accused 146:1,6	11:17 12:20	62:23 63:15,17,21	142:18 143:15	104:9 108:21
149:7 151:17	allegation 164:20	63:23 64:17,19,21	153:4,6,8 162:22	begged 156:3
157:2	165:4,17,20	67:22 71:15 73:4	163:14 164:11	beginning 2:7
acting 7:4	allegations 163:1	73:5,8,10,13,16	170:2 172:18	begins 104:5,7
action 1:9 19:2	allowed 20:13	73:21,22 74:17,22	A-l-p-h-o-n-s-o	124:15
179:17	148:4	75:5,20 76:6,15	8:14	believe 9:5 13:2
Adam 22:15 23:13	Alphonso 8:14	76:23 79:18 80:15	B	14:18 15:17 20:19
87:19 90:7 94:3	ambulance 173:4	119:15 146:18,21	B 4:8 35:10,21	21:17 23:4 36:3,5
add 102:17,19	173:10	149:16 162:6,12	41:21 44:12,16,20	42:3 44:17,20,22
added 29:14 102:11	answer 19:21,22	166:17,18 173:5	48:12,15,16 49:3	47:18,19 49:8
105:9	115:5 138:14	areas 34:6 59:8,10	55:11 113:5 126:7	72:11 74:12 116:7
address 11:15 12:5	140:17 160:19	71:11	126:10 127:10,12	121:11 130:18
12:7,11	165:1,10	Army 13:5,11,15	back 18:9 22:11	143:1 164:3,4
adds 79:23	answered 114:10	14:8	24:5 36:20,21,22	175:5
adjust 77:12	115:10	arrest 19:18 25:23	37:7,21 38:5	bench 52:11,14
administered 126:6	answers 139:17	26:1	55:14 58:1,8 60:6	54:7 71:22
administration	179:9	arrested 19:4 64:15	62:5 64:1 67:19	benches 51:17
32:6,11,23 57:13	anybody 59:1	arresting 18:12	68:9 74:8 93:2	bend 46:15
57:14 77:23 82:4	62:19 122:18	116:1	97:22 109:15	Benton 16:22
121:2 144:23	156:12 162:1	arthritis 17:16	110:1 111:8	best 22:22 24:12
administrator 21:1	168:17	asked 157:19 169:1	112:16 120:3	44:23 49:1
21:3,10,18 22:1,7	anymore 20:10,23	asking 157:15	122:12 126:6,10	beyond 52:16
22:21 23:3 24:2,7	138:3	asks 123:16	126:14,16 127:1,1	big 29:15 43:8 60:3
121:7 136:20	anywise 179:18	assign 2:23 27:15	127:12 132:11	60:12 66:17,20
137:8 138:2	apart 95:16	assigned 115:3	136:18,23 146:11	68:17 71:5,6
administrators	appears 26:22 99:1	116:2,4 121:5	146:16,17,23	119:16 125:15
24:9	105:16 107:9,14	assignment 39:21	162:5,11 163:4	126:3
ago 63:8	107:20 108:2,16	assistance 146:23	171:18 172:23	bigger 67:22 68:20
AGREED 1:20 2:9	applied 14:21	assistant 21:4 22:7	174:2 175:18,22	70:11 73:8
2:17 3:5	appointed 21:17	22:13 23:2,8	backing 118:1	Bill 145:2
ahead 156:15	Appointment	85:14	bar 67:7	bipolar 168:14,16
air 72:20 73:7	140:19	Associates 12:22	basis 95:20 167:18	168:21 169:8
77:17	approximately 2:7	assume 115:15	bat 84:16 107:7	Birmingham 5:12
aisle 35:22	17:14 68:21 69:17	attempt 151:21	bathroom 39:4	5:18 7:2
al 1:12,16,23 7:13		attempted 151:16	40:16,17 45:19,23	birth 8:18

blanks 135:5	boy 83:17	50:23 71:6 114:9	cause 7:14 179:19	check 156:14 164:5
blister 105:5	Bradgel 87:23 88:2	119:7	cease 17:1	chief 21:21
175:12,16 176:12	Bradley 1:16,23	buy 28:1	ceiling 70:14 72:13	children 9:11 10:16
177:10,18	7:14,22 8:10,11	buzz 31:19	cell 28:20 31:22	11:10
block 31:22 35:9	8:12 9:1 10:5,16		34:6 35:9 43:5,14	choose 125:18
42:1,8,14,16,20	10:20,20 16:12	C	45:21,22,23 46:18	chooses 125:4
43:5,14 44:4,11	19:20,23 20:2	C 5:1 35:10,21	46:20 47:8 51:4	chosen 125:11
44:12,16,20 45:4	125:8	41:21 47:13,14	51:10,18,18,20,21	chronological
47:13,14 48:5,8	break 27:19 38:15	48:4,8,10,17,20	52:3 53:17 55:5	134:16
48:10,12,12,16,20	111:1 175:21	55:11 179:1,1	58:22 74:6,8 76:2	Chuck 16:9
48:21 49:6,21,22	breakfast 100:2,6	cabinet 30:19	118:23 119:16	circumstances
50:11 51:8 52:21	100:13,15	Calfee 84:2,5,23	127:11,13,17	143:7,11 175:1
52:22 55:11 58:22	breaks 38:14	88:11 92:13 100:8	128:3,5,8,11,14	city 10:7,13,14
67:18 113:5 126:7	breath 145:4	125:8	132:13 149:13,15	11:17 12:10,20
126:10 127:10,12	brief 81:14 111:2	Calfee's 99:15	153:14 155:3,8,20	13:6,13 14:8,10
blocks 28:20 34:6	briefing 41:7,13	125:19	155:23 156:4,7,14	14:15 15:8 16:23
41:19 45:8 47:8	briefly 85:5	call 28:6 37:22	158:2 159:4,10,12	174:17
55:12 74:6,8	bring 64:13,15	39:12 42:23 43:17	161:1 163:12,19	Civil 1:9 7:7
112:17	bringing 61:8	55:17 60:10 63:14	163:21 164:13	clarification 178:2
blow 29:17	broke 150:8	63:14 71:10,17,19	cells 41:18,23 42:7	clean 56:9 147:13
Board 89:22	broom 152:2	77:16 95:7 109:13	43:4 44:15,18	clear 97:10 98:1
bold 126:3	165:17,18 167:1	175:16	47:16,19 48:23	Clearing 16:13
book 61:13 110:4,4	brooms 166:17,20	called 24:8 60:10	49:6,22 50:4,16	close 60:5 66:1
booking 26:2 27:16	brought 145:2	63:4 71:8 173:11	51:7 52:21 53:5	122:16
33:15,21 56:17,20	157:21 161:3,6,12	calls 44:3	53:14,16 54:11	closed 51:5 177:4
57:1,6 59:9,12,15	161:16,23	camera 29:2,2 47:4	55:22 58:6 59:3	closes 62:14,15
60:2,8,9,11,18	BRYAN 1:5	47:5 70:4,6,8,15	63:2,16 65:11	closet 166:21
62:23 63:21,22,23	BS 139:21,21 140:8	113:14	110:10 119:20	closing 36:7
64:22 73:10,16,21	bubble 175:20,20	cameras 29:4,6,10	120:2,3,6,8,11	clue 31:3 77:10
75:5 76:2,23	175:21 176:14	captain 16:8,8	center 28:22 34:23	106:11 177:14
109:12,14 118:5	buckets 112:16	card 164:12,14	certain 40:13 109:7	cold 76:20 77:3,4
141:15 146:18,21	bugs 159:10,12	cardboard 175:18	134:15	155:21
149:23 166:18	163:11,15,19,21	176:5	certainly 147:2	collect 43:17
books 58:4	built 11:20 49:11	care 21:22 41:16	162:20	college 10:14 12:18
bottle 105:3 176:5	67:19	73:17,20,21 74:2	certify 7:5 179:6,15	12:21
176:10	bulldozer 17:3	74:5 75:4 76:5	change 19:10 24:3	combat 151:6
bottles 109:21	bulldozers 15:15	79:17 97:7	40:22 114:2	come 14:3,6 19:7
177:19	bunk 54:15,21 55:1	CARROLL 5:9	changed 30:2,23	25:19 31:13,16
bottom 42:10 49:23	bunks 46:22 51:15	carry 109:20 110:7	31:5 78:13 102:11	32:4,9 34:10 37:6
50:3,6,8 53:6,8	51:23 54:23	cars 155:5	113:23 115:20	39:12,14 41:6
94:11 114:6 136:3	business 15:13	cart 110:7	118:10	56:14 57:3,5,19
141:11	16:11,20 17:7	case 124:15 125:14	changing 29:21	59:16 60:6 61:18
box 11:16 77:7,11	busy 39:10	126:2 166:11	41:1	61:22 64:5,8
82:4 136:19 141:7	button 37:3 38:6	caught 38:17 62:17	Charles 10:19,21	85:20 86:8 90:20
		62:19,22		

91:11 95:13 109:23 146:11,16 146:17,23 comes 90:23 coming 32:21 commissary 135:5 135:12 Commissioner 2:2 3:6 5:5 7:4 179:23 common 146:14 communicating 118:13 communication 135:2 company 10:10 15:15 16:13 17:2 complain 135:13 144:14 155:22 complained 159:9 160:6,14 163:11 163:18 complaint 25:20 167:19 complaints 144:11 145:13 152:20 163:15 complete 45:23 46:1 compliance 2:13 complications 92:23 computer 29:1 80:4 117:15,18,22,23 123:21 computerized 123:19 concrete 66:10 67:18 condition 168:17 168:19 169:11 170:1,17,22 171:6 configuration 47:15	configured 76:7 confused 56:23 consecutive 124:20 considered 21:6 console 51:1,2 constructed 53:15 construction 10:10 10:12 15:14 consult 169:17,19 consulted 169:22 contact 163:9 continuously 18:6 control 35:22 121:3 controlled 73:15 74:9 controls 73:12 conversation 44:1 160:21 cooking 56:9,19 cooling 72:23 Coosa 2:3 7:9 15:9 18:1 141:18 142:20 copied 106:2 copies 103:10 132:21 173:18 copy 81:10 111:10 117:18,18 128:17 corner 66:7 70:12 70:13 93:20 corporal 20:6 correct 9:7 26:5 27:1 36:3,5 62:11 86:19 131:14 150:2 161:4 176:13 179:12 correctly 36:3 corridor 44:7 counsel 1:22 2:19 2:21 7:8 179:16 count 122:4,6 counting 36:2 County 2:3 7:10 15:9 18:1 83:21	89:7,18 113:13,15 113:16 141:18 142:20 179:4 couple 54:16 course 22:13 61:10 court 1:1 2:14 7:2 7:18 61:7,9 64:14 Courthouse 2:4,4 7:10,10 cover 39:3 99:1 112:15 covered 41:2 75:13 covering 108:14 covers 75:19 CPL 20:2 cracking 157:3 crew 173:5,7,10 Crews 176:23 177:9 cubicle 40:19 cubicles 51:10 cuffing 61:12 cup 158:11 cutbacks 16:3 D D 4:1 35:10,21 41:21 49:21,22 51:8 55:11 99:20 daily 95:19 Dana 83:19 84:11 88:13 89:3 99:17 Daniel 1:5 2:1 5:4 7:1 179:22 date 7:5 8:18 98:9 114:7 162:15 dated 136:9 dates 21:19 127:20 127:23 day 2:6 7:12 26:3,7 26:13,15,17 27:14 28:12 30:3,18 36:12 38:23 41:8 42:19,20,23 45:9 45:20 46:9 47:9	47:22 53:7,8 61:8 61:10 79:16,23 81:6 82:6 85:11 85:22 86:3,21,21 90:22 92:5 93:17 96:15 100:4 116:21 125:1,21 132:6 146:15 162:2,4 173:22 days 27:9,10 30:21 30:22 100:10 107:1 dead 38:3 deal 56:10 172:14 death 143:8 December 83:11 127:16 129:1 131:4,4,10 decided 17:10 20:23 decision 128:15 173:13 Defendant 1:14 5:14 degree 12:22 169:23 delayed 14:23 deliver 137:22 delivered 25:14 delivering 109:19 demonstrating 32:17 34:8 35:11 45:6 48:18 52:13 54:8 64:12 66:21 71:6 denied 157:8 department 13:14 14:9,11,16 17:20 17:22 18:7,11 129:8 145:21 depending 85:22 120:23 depends 109:22,23 156:19	DEPONENT 178:8 deposition 1:16,23 2:10,11 3:2,6 81:16 111:4 162:18,23 179:7 179:13 depositions 2:15 deputies 61:10 89:1 116:6 118:13 146:11,16,22 151:4,9 deputy 19:17,20,23 21:21,23 61:7 83:21 88:3,20,21 88:22 89:3,17 115:23 150:15 designated 120:5,7 designation 113:13 desk 109:13,16 determine 37:6 147:9 determines 96:8 detox 63:5,8,10 132:12,12 Dewayne 84:14 88:18,19 99:18 diagonal 32:19 die 143:21 died 142:19 143:4 difference 49:9,15 53:14 72:1 different 41:19 48:20 74:15 80:16 105:17 116:3 119:5,15 125:3 171:11 dimensions 65:2 directions 176:2 directly 46:17 170:9 discharge 13:22,23 disciplinary 123:8 disciplined 144:5 discuss 168:10,16
--	--	---	--	--

170:8,8 171:13 discussed 166:11 170:13 discussing 171:1 discussion 8:5 81:13 111:19 128:20 134:4 136:1 138:18 167:13,20 discussions 167:3 dispatch 27:16 29:1 39:3 57:6 60:2,5 60:19 75:4,18,19 79:18 80:15,22 118:5,12 dispatcher 18:13 25:13 33:6 dispatching 32:13 32:14 33:8,15,17 33:20 34:18 dispense 110:5 distributing 109:8 DISTRICT 1:1,2 dividing 45:7 DIVISION 1:3 divorce 9:23 divorced 8:21,23 9:4,7 doctor 27:23 169:16,21 170:9 170:11 doctor's 176:1 document 40:4,11 111:7 documents 26:22 79:9 133:11 140:6 doing 19:12 24:10 37:20 38:18 39:11 117:22 Don 87:6 88:16 90:2,3,4 door 32:5,9 33:12 33:13 34:3,4,5,14 34:20 41:6,6 44:8	44:10 47:1,2 50:21 56:15 57:6 57:15,20 60:4 61:17,19,21 62:4 62:14,16,22 64:4 64:9,23 65:19 68:15,18 70:9,12 109:15 110:14,15 164:4 doors 32:1,2 34:15 35:12,18 36:7,12 37:4 46:23 47:6,7 50:19 64:7 97:9 97:10,11 downstairs 31:15 38:16 39:10 79:16 79:23 96:18 Dr 174:11,15,16,22 175:3 drain 66:5 153:11 drinking 144:15 145:8,14,18 Drive 5:10,22 drug 105:6 175:23 176:23 177:4 drugs 104:22 duly 7:23 duplicate 103:10 duplicated 80:21 duties 19:10 25:11 duty 172:21 <hr/> E <hr/> E 4:1,8 5:1,1 35:10 35:21 41:22 52:21 52:22 55:11 179:1 179:1 East 174:10 eat 43:3 educational 12:16 effect 2:12 effects 54:12 eight 9:9 40:18 44:18,22 49:6 65:6,6,11,20	69:11,11,17 85:12 85:12,19 116:6 120:15 158:5 eighteen 60:17 112:9,10 either 21:14 27:22 37:22 44:19 65:17 66:8 72:5,9 85:9 85:22 93:14,17 158:5 electronically 50:21 eleven 174:1 ELEY 5:21 emergency 173:14 173:16 employed 88:4,7,11 88:14,17 employee 141:19 145:20 employees 16:16,19 82:17,20 employment 144:7 encompass 75:9 encompasses 75:6 encounter 157:4 enforcement 12:23 entity 18:18 entrance 34:12 155:12 entries 119:10 129:3 entry 112:9 114:7 119:3,6,20 132:6 140:15 173:20 equipment 17:8 escorted 112:17 126:6 127:12 especially 61:7 et 1:12 Evans 18:4 145:2 evening 26:20 everybody 110:13 171:8	evidence 3:2 exactly 29:13 49:17 116:18 128:6 164:2 exam 118:22 119:11 126:21 155:13 examination 4:2 7:15 8:7 175:7 examined 8:1 examining 140:5 example 81:5 91:22 118:21 128:22 exclusively 25:9 Excuse 63:20 exercise 159:14,17 160:2 exhibit 4:9,11,13 4:15 81:8 98:13 98:15 105:12 111:15,21 132:5 132:17 133:4,6,12 133:15 explain 175:10,11 175:14 explanation 91:19 E5 13:20 <hr/> F <hr/> F 179:1 face 150:8,10,13 152:7 facilities 45:20 facility 70:20 72:4 fact 167:4 fairly 66:1 fall 13:6 22:19 fallen 143:19 familiar 91:18 far 54:14 56:8 70:3 70:12 72:19 77:23 82:16,17 89:6 121:4 151:8 165:2 fastened 52:10 feed 76:8	feel 38:23 feet 40:18 60:16 69:11,17 152:19 152:21 felt 121:21 122:2 female 84:13 fifteen 10:22 29:11 66:20 113:19,21 164:6 fifty-nine 126:5 fifty-one 8:17 fifty-six 112:10 fifty-three 114:10 114:18 115:10 figure 91:13 file 133:19 filed 82:9 141:17 filing 3:5 fill 96:7,12 104:14 124:4 129:2 135:1 141:6,10 177:6 filled 95:19 96:11 102:12 124:6 136:16,17,22 176:22 177:16 filling 79:14 81:20 121:18 139:12 fill-in 95:12 fine 58:16 177:22 177:22 finger 60:7 finish 39:13 finished 11:22 122:11 first 7:23 14:7 31:12 44:10 48:16 56:15 57:6 64:9 83:19 98:23 99:9 99:19 100:9 114:10 115:11 134:17 163:17 173:9 fit 67:20 five 35:22 41:19
---	--	---	--	--

42:13 44:22 49:22 51:7 74:11 85:13 85:20 102:16 112:18,21 113:4,7 121:11 139:2 fixture 71:3,4 fixtures 70:2 floor 27:21 31:19 51:12,13 66:6,10 66:13 153:2,5,10 153:18 155:4 floors 56:9 fluorescent 69:1 flush 70:23 71:1 156:3,15 flushable 66:5 flushed 156:5 flushing 156:6 folks 92:7 110:9 following 7:16 27:6 follows 8:1 follow-up 105:23 font 125:4,12,18 fonts 125:3 fooled 30:3 foot 66:19 67:10 68:20 force 2:12 123:9 forced 153:9 foregoing 7:8 179:7 179:11 form 2:20 93:13 98:4 123:5,12,13 123:19 124:1,2 136:16,18,20 141:9,10 148:13 159:16 160:10,17 163:14 164:23 165:7,9 169:13 format 112:4 forms 4:16 114:12 123:10 133:20 134:20 135:16 Fort 13:9	forth 62:6 forty 68:4 found 93:3 98:7 four 14:4,19 35:5 44:19,21,21 74:9 74:11 85:12 90:16 91:23 99:22 100:4 102:16 112:15 133:13,15 fourteen 65:8 113:6 fourth 99:21 100:5 107:13 frame 23:16,17,23 24:1 25:7,12 58:9 58:10 78:4 82:15 131:19 frames 99:23 Frank 8:10 10:20 Franklin 16:9 frequently 156:17 Friday 27:3,7 front 32:5,9 34:17 36:18 43:9 57:4 57:15,20 60:9 62:10 64:11 74:3 75:13,17,20 112:14 122:5 126:14,18 full 2:13 19:18 86:11 99:1 102:23 103:18 full-time 21:2 further 2:8,16 3:4 174:3 178:8 179:15	154:2,4,9 157:9 173:1 given 97:14,16 100:8 110:12 128:16 138:1,10 149:5 157:18 179:13 gives 38:14 43:8 115:1 giving 108:23 110:20 glass 157:20 158:2 158:6 go 8:11 15:13 17:10 17:23 19:19 24:5 28:1 31:22 33:11 33:12 34:3,5,11 36:11,19,21 37:16 37:17,20 38:8 39:4,8 40:15,16 40:23 41:11,12 44:7,9 53:4 55:4,7 56:17 57:11 59:22 61:23 62:5 64:6 64:18 70:9 80:22 81:9 89:2 97:18 111:6 116:12 119:12 122:12 137:16 146:2 149:19 155:18 156:13,14,15 172:23 goes 10:13 33:14 34:21 35:2,4 36:22 50:9 64:4 71:23 80:9,16,22 106:5 171:18 going 14:21 18:9 31:21 32:1 34:9 34:16 55:20 62:9 81:7 83:2,3 128:10 133:12 147:10 173:13 good 39:1 87:9	111:1 Gordon 13:10 grabbed 147:4 Grading 16:13 graduate 13:1 graduated 13:8 grate 66:14,23 Great 132:23 Green 83:20 85:2,3 89:13,14,15 91:10 grievance 114:11 135:6 136:8 139:3 groceries 28:1 grounds 2:23 group 111:16 124:14 133:12 guess 18:18 67:5 71:20 104:6 guessing 65:9,21 69:16 116:17 guidelines 122:1	happened 31:4 38:4 41:8 102:14 121:22 122:7,10 122:16 123:17 happens 80:18 123:6 hard 117:17 158:8 158:9,13,14 175:18 Harris 83:19,23 84:6,7,8,11,14,23 84:23 88:13,16,18 89:3 91:8 99:17 99:18 174:11 Harrises 84:10 hats 22:3 Hawkins 132:11 Hay 22:12 23:12 85:7,8 86:5 89:19 89:20 94:12 138:9 head 23:1 29:12 42:3,5 45:1 49:5 65:22 84:2 116:11 162:8 178:2 heading 93:7 hear 151:10 heard 71:12 142:14 151:11 162:18,20 163:18 164:9 171:17 hearing 163:21 179:14 heat 73:7 held 8:5 18:10,16 53:11 81:13 111:19 128:20 134:4 136:1 138:18 help 61:11 helping 110:21 hey 39:2,12 He'll 11:2 high 69:9 Highway 5:17
---	---	---	---	---

hip 17:17	56:1,2	110:16	jail 20:5 21:1,9,22	144:15 145:18
hired 18:3 92:12	housed 28:13 42:16	initialed 100:11	21:23 22:1,5,20	jobs 18:10
history 12:16 13:4	48:7 50:1 59:2	138:6	24:1,7,8 25:1,9,12	joined 13:5
hitting 146:7	HRS 112:9,10,11	initials 93:22,23	29:9 31:11 32:4	Jr 8:10 16:22
hold 45:12	hub 28:22	99:4 106:17 107:2	32:21 35:8 36:16	July 11:22
holding 59:8,10	hurt 143:19 173:2	107:11,16 108:18	36:17 37:1,18	June 17:20
63:1,14,17 64:9	husband 84:14	109:2	41:9 51:11 56:7	junior 10:14 12:21
64:19,21 65:10,11	87:2	injury 143:14	57:5,15 59:4	juveniles 56:1,2
65:14 67:22 71:15	<hr/> I <hr/>	inmate 4:16 72:16	71:13 73:1,2,18	<hr/> K <hr/>
73:4,5,13,22	idea 30:8 118:3	97:22 98:3 114:15	78:1 79:3 82:15	Kay 87:1,9 89:23
74:17,22 110:10	identification	123:7 133:20	82:18 89:8 91:18	keep 34:9 157:20
118:23 119:15,20	98:17 111:23	134:19 136:23	98:8 118:19 121:2	keeping 56:8 117:8
127:17 128:3,4,7	133:8,17	142:20 150:4	121:7 122:4,6	Kelly 1:5 84:1,15
128:11,14 132:13	identified 37:5	177:3	132:2 133:19	84:23 87:14 89:9
149:13 153:14	identify 101:14	inmates 25:17	135:3,20 136:19	126:6,9 128:4,10
155:3,8,20,23	III 5:8 10:20	28:13 31:11 36:14	138:2 141:18	138:12 146:1,8
156:4,7 158:2	imagine 90:18	56:6 58:4 71:11	142:20 143:14	147:3 148:21
161:1 162:5,11	immediate 24:16	71:17,18 123:15	144:1,8,12,22	149:7,9 150:5
166:17 174:2	82:5,21 84:18	135:2,19 143:16	146:11 147:21	151:15,22 152:1,6
hole 66:12,18 70:21	95:9 137:19	143:17 144:19	148:3 154:15,20	152:18,20,23
71:9,10,15,19	immediately 95:22	152:8 176:16	154:23 167:3	153:5,9,13,20
holiday 130:21,23	important 121:22	input 78:9	168:10 169:22	154:1,4,7,13
Holingquest	122:2	insert 152:3	170:15,18 172:14	155:19,21 156:2,7
174:10	inbox 137:10	inside 12:10 50:11	173:6 174:19	157:2,5,7,9,15
hollering 160:7	141:11,13,14	68:2 69:2 70:23	jailer 18:14 61:4	158:1,20 159:9,13
holster 150:16,18	incarcerated	109:14	89:7 149:14 162:5	160:1,11,13,23
150:20,22,23	167:16	instance 99:6	jailers 77:22 113:9	163:10,23 167:4
151:5,14	inches 66:20 68:4	157:17	113:11 116:9,20	168:11,14 174:2
home 11:15 14:4,6	incident 122:21,22	instructions 105:2	117:1	Kelly's 152:16
honor 13:8	122:23 123:4,6,14	intercom 37:23	jailer's 89:6 112:19	153:22 160:7
Honorable 13:23	124:5	38:6 114:8 115:6	jails 29:10	164:19 170:16
hook 155:7	independent	115:7	James 174:11,15,16	Ken 21:20
hooks 70:16	131:18	interested 179:18	175:3	Kenneth 94:12
hose 154:14,16,18	indicating 69:4	intoxicated 66:9	Jan 84:2 99:15	138:8
154:23 155:7,11	94:3 96:5 99:7	investigation 13:9	100:8	kept 21:19 58:4
hoses 155:1	103:4 105:10,23	investigator 13:12	January 19:9 86:4	109:6,10,12,16
hospital 177:3,7	106:1,2,3,23	involved 16:3 19:2	94:18,20 101:8	127:14 128:2,4,7
hot 76:20,23	129:4 139:5	123:17	106:5 111:11	128:10 158:2
hour 26:18 28:3	140:20 173:18	isolation 119:23	124:15 127:17	166:17,20
29:22 85:21	individual 21:7	120:1,2,11	129:1,2 167:18	key 119:20,21
hourly 129:3	51:21 53:17 54:17	items 54:18	168:9 170:19	149:20
hours 24:23 126:5	individually 176:6	<hr/> J <hr/>	JEFFERSON	keyed 119:3,10,17
132:9 174:1,9	initial 82:10 94:11	J 5:8	179:4	kick 151:16,18,21
house 11:21,23	98:4 99:20 104:9	Jackson 9:20	job 14:7 24:10	kicked 149:9 150:7

150:9 165:5 kicking 149:8 150:4 kin 179:16 kind 64:20 68:22 71:4 123:9 175:10 kitchen 56:11,12 56:14 57:8 74:18 74:19 76:6 155:4 knew 163:3 167:7 171:8 know 16:2 29:11,13 30:5,12,15,16,16 31:6 36:17 40:7,8 49:11,17,17 55:2 63:10,11,12 69:14 69:16,20,20 71:17 72:19,21 73:19 74:7,23 75:1,3,6,9 75:10,11,23 76:3 76:9,12,17 77:6 78:14 82:8 83:1 87:13 88:2 89:14 90:3 91:21 92:3,4 92:6 93:23 94:8 99:18 101:10,13 101:15 102:3 103:2 104:21 105:11,15,18 106:9 112:22 114:17,22,23 115:3 116:11,13 116:18 120:18,19 122:17,18 123:20 124:10 125:21,23 127:20 128:1,6,14 132:15 139:14,15 140:7,8 142:3,7,7 142:10,16 143:6 143:20,22 150:15 150:17,19,20,22 155:10,16 157:17 159:5,16,19,23 162:14 164:7,8	165:2 168:18 169:4,9,14 171:23 172:2,3,8,22 174:13 177:12,20 Kristi 5:15 KSH 94:7 138:6 L L 1:18 5:20 60:14 labeled 63:12 104:23 laid 41:18 95:14 Lakeshore 5:10 large 2:3 7:4 119:21 lavatory 52:20 law 12:22 laws 2:14 lawsuit 142:15 145:23 lawsuits 141:17,21 141:22 142:13 layout 32:4 leading 2:20 leave 15:19 28:15 40:21 62:4 85:18 90:21 110:3 leaves 40:20 leaving 14:20 ledge 67:19 Lee 114:7,11,13,14 left 13:15,16 15:12 15:23 32:7,11 33:1 35:10 44:10 56:16,20 57:2,9 57:16,18 59:19 173:15 left-hand 55:21 leg 151:2 legal 19:2 legs 25:6 length 30:14 letters 153:21,22 let's 19:16 100:12 108:5 140:13	level 31:10 42:8 45:2 53:3 54:20 54:23 library 55:15,16 57:22 58:2,21,21 76:10 Lieutenant 22:10 lighting 68:23 lights 69:1 limit 167:21 168:3 limited 58:10 limits 12:10 lined 43:7 Lipscomb 83:13,22 84:5,22 88:6 90:10 list 95:6 115:23 116:12 listed 90:9 91:6 listen 43:23 lists 105:13 little 14:4 17:15 29:16 32:18 51:16 52:9,11 64:6 67:7 68:20 87:3 93:2 175:20 live 10:6 12:1 lived 11:18 12:8 located 29:8 48:11 56:13 57:8 59:8 59:15 63:17,21 70:4,7,8,13 72:13 73:2 76:11 141:14 lock 50:16,20 77:7 77:11 locked 61:21 log 40:10 79:11,21 80:2,13 81:18 93:9,16 95:17,17 96:20,22 97:17 101:19,23 115:1 121:19 122:10 124:18 125:1,6,7 125:16,21,22	156:23 160:3 logs 4:12 98:7 111:11 112:2,2 117:9 118:2 132:2 long 9:8 11:18 12:4 14:14 15:10 16:14 17:4,12 55:9 60:16 62:8,13 87:4,8 92:20 128:3,7 156:20 177:21 longer 84:3 85:8 89:20 look 28:22 29:17 39:2 46:15 82:6 82:22 83:4,10 90:19 97:19 98:10 106:7 108:12 127:21,21 132:8 134:1 156:15 164:16 173:21 looked 63:7 120:15 163:5 looking 26:21 37:11 79:8 80:11 81:5 93:19 98:18 98:23 100:9,22 105:11 107:8 112:1,14 114:5 124:13,18 125:20 126:4 132:5 135:21 138:5,15 173:20 looks 83:9 93:20 94:2 103:18 105:21 106:4 129:20 139:2,20 loops 29:22 lot 69:7 177:5 low 151:1 lower 93:19 lucky 62:18 lunch 100:2,7 L.D 16:22	M machine 30:1 60:7 main 2:4 7:11 31:18 32:1,20,22 34:21 57:15 59:16 79:5 maintained 30:13 117:14 maintenance 56:8 making 17:7 163:1 man 84:12 118:17 March 23:20 58:18 mark 81:8 98:12 111:15 132:16 133:2,3,12 135:13 marked 44:11 63:13 65:19 98:16 111:22 133:7,16 138:23 139:2 marriage 9:17 married 8:20 9:8 9:19 11:6 mash 37:3 38:5 mat 67:20 153:10 mattress 153:18 ma'am 142:5 176:8 176:19 178:4 McDonald 4:4 5:15 5:16,16 69:13,19 81:9 83:15 92:2 101:11 103:3,8,11 103:15,22 104:3,8 120:17 124:17,22 133:21 134:5,9,13 139:4,7 140:10,13 140:18,21 141:1 142:2,6 143:16 148:12 159:15 160:9,16 161:5,8 161:11 163:13 164:22 165:6 167:8,12,15 168:2 168:5 169:12 170:3 172:8 175:7
--	--	---	--	---

177:23 meal 96:19,21 100:7,13 157:18 meals 25:14 97:3,5 mean 19:20 28:17 39:5,14 63:18 78:14 79:3 150:17 166:18 169:8 171:12 173:8 means 118:12 173:9 measurements 120:20 med 109:13 medical 96:20,22 98:7 110:4 135:5 135:10 138:23 169:11 170:1,17 171:1,6,9 173:1,5 173:7 174:2 medicate 175:13 medication 4:10 96:2,3,10,13,15 97:20,21 102:9,10 168:23 170:22 172:10 175:13,19 176:7,10,18 medications 11:12 25:15 102:6 105:13 171:10,11 176:20 medicine 96:23 97:8,14,16,18 98:5 102:13 171:18 172:1,3,6 177:19 medicines 108:22 meds 109:6,19 110:2,5,12,15,20 175:22 men 42:15,17,17 45:12,13 48:9 mental 167:5,20 168:11,17,19	mention 141:20 mentioned 141:23 175:12 message 137:22 metal 43:2 66:23 microphone 118:16 mid 127:15 middle 1:2 42:22 45:8 101:4 midway 132:8 Mike 40:8 mile 12:8 military 13:7 112:12 mind 175:11 mine 99:14,15 105:21 125:13 126:1 134:15 miniature 52:12 minute 104:2 minutes 164:6 moment 83:6 Monday 27:4 money 17:8 monitor 29:5,15 43:20 Montgomery 5:17 5:23 16:9 month 98:10,11,19 100:23 101:4,7,9 101:14 102:23 103:19 106:5,10 106:13 month's 99:2 Moon 87:22,23,23 90:9 mop 112:16 mops 166:22 morning 26:20 100:5 mouth 97:23 moved 11:21 132:11 moving 61:11	mustache 147:4,23 148:5,11,16 149:3 149:4 mustaches 147:21 mutual 39:6 <hr/> N <hr/> N 1:18 4:1 5:1 name 8:8 9:21 10:4 22:9 65:12 83:19 87:5 89:15 114:16 116:14 143:1 176:1 named 71:11 names 82:13 86:16 102:6 115:2 143:20 148:18 necessary 2:18 need 20:23 21:7 39:5 62:5 80:1 needed 86:1 95:13 114:11 121:1,2 171:6 178:1,1 needs 97:19 134:23 neither 179:16 never 30:3,9 78:12 145:16 152:10,11 155:9 159:3,13,20 171:19 new 11:20 20:11 29:14 71:13 91:11 102:10 115:23 night 26:7,11 30:2 31:1 84:17 85:22 91:4,17 93:16,17 103:18 113:3 117:2 124:18,21 nineteen 112:11 ninety-five 113:7 ninety-nine 125:16 nobody's 62:21 normal 38:1 normally 27:14 38:18 41:11,15 67:8 91:16 96:18	116:22 117:3 122:4 125:13 137:18,21 176:4 North 12:7 Notary 2:2 5:5 7:3 note 29:20 138:13 157:11 noted 80:19 160:2 notes 131:23 notice 3:5 29:19 90:14 112:7 135:4 174:3 noticed 118:20 119:2,22 notified 173:4 November 23:18 58:17 101:5 131:3 136:9 167:17 168:8 170:19 number 12:12 65:14 112:19 113:12,18 115:17 116:3 121:12,15 numbered 30:17 numbers 113:11 <hr/> O <hr/> O 1:18 Object 148:12 159:15 160:9,16 163:13 164:22 165:6,8 169:12 objections 2:18,22 observation 28:11 174:3 obvious 171:12 occasion 130:8 occasions 146:7 occurred 132:1 162:16,16 offered 3:2 office 12:6,11 19:7 32:5 62:11 74:3 75:14 114:4 175:3 officer 18:12 26:2	36:22 officers 116:1 official 19:15 off-the-record 8:4 81:12 111:18 128:19 134:3 135:23 138:17 oh 108:11 132:20 139:2 174:4,9,12 okay 12:14 20:3 21:13 23:19,22 27:14 58:14,15,19 62:12 63:19 69:22 74:13 78:2 83:7 83:13 86:13 91:3 91:7 92:1 94:13 99:14 100:20,21 104:11 107:5 108:19 115:14 124:22 132:7,10 132:20 134:8 138:22 139:6,7 173:23 175:4 177:13 old 8:16 10:21 11:4 older 20:3 once 31:5 136:17 ones 29:8,14 71:18 84:18 open 36:10 42:22 43:8 46:23 50:13 50:21 60:4 62:5 73:8 110:4,14 176:9 opened 51:5 97:9 97:11 opening 36:7 opens 109:15 operate 72:16 76:18 77:1 operates 30:5 72:18 operating 17:8 25:17 62:4 oral 7:15
--	---	--	---	--

order 101:22 134:16 originals 134:1 ounce 158:6 outside 64:3 68:16 71:2 144:1 151:5 overlooks 28:12,16 oversee 25:16 overtime 130:22 Owens 1:12 19:7 19:11 20:21 145:12 owned 17:3 o'clock 138:21	partner 16:20,20 39:16 78:20 79:5 part-time 17:6 21:3 pass 33:18 passed 96:18,21 97:13 135:17 patients 172:15 patrol 25:3,6 89:2 patrolman 14:13 payroll 128:22 129:7 Peebles 2:1 5:4 7:1 179:22 people 21:5 25:19 25:21 27:12,15 28:2,5 36:13 41:9 54:4,11 61:8 64:13 66:9 80:17 90:8,14 91:6,15 91:23 113:2 147:20 148:19 161:15 166:4,7 174:19 Peoples 22:15 23:14 87:18,19 90:7,10 94:3 people's 115:2 percent 125:17 period 20:22 75:22 120:4 172:9 permanently 40:4 person 24:2 28:5 28:14 31:15 36:8 36:9 37:9,10,12 37:13 38:10,22 39:9,10 40:15 41:10,14 54:3 62:3 84:1,15,17 89:11 90:22 91:11 95:6,12,13 96:17 109:19,21 114:21 115:5,12 116:23 125:5 147:8,15 161:19	personal 54:12 171:1 personally 142:9 159:7 171:19 personnel 36:18 37:1 85:17 135:3 173:16 pharmacy 177:6 phone 19:21,23 37:22 43:22 44:3 77:15 126:13 phones 43:15 45:14 48:1 49:19 physical 157:4 physician 174:16 physicians 176:21 pick 37:22 77:15 picnic 52:12 pill 154:9,11 pills 154:2,3,4,5,8 154:10,10 pipe 154:14,16,18 pitcher 157:20 place 53:7 71:16 109:7 123:18 141:11 placed 21:21 164:12 176:6 places 73:18 174:21 plaintiff 1:7 5:7 170:6 Plaintiff's 98:14 111:20 133:5,14 plan 51:12,14 plans 63:7 plastic 158:5,7,8,9 158:13,14 175:20 plates 96:19,22 please 8:8 13:4 134:13 175:15 Plus 27:10 28:23 pod 28:11 point 60:17 145:5 167:9,11	Pointe 5:22 police 13:7,14 14:9 14:10,15 policy 122:14 148:3 148:7 172:13,16 172:19 pop 176:14 port 64:4,5,16 position 163:7 165:21,23 166:3 positions 18:16 possible 27:18 post 12:6,11 powers 19:18 practice 146:15 pregnancy 93:6 pregnant 92:22 prescribed 176:21 prescription 104:18,20 105:3,4 177:15 PRESENT 6:1 pretty 26:2 87:9 93:11 previous 9:16 130:8 previously 9:18 pre-set 72:22 Pricare 174:17 175:2 print 60:7 81:21 126:3 printing 124:3 prior 3:3 privy 170:7 probably 60:15 65:8 66:19 68:19 101:6,8 114:14 149:5 156:21 problem 134:12 135:11 164:10 171:9 problems 167:5,21 168:11	procedure 7:7 38:2 98:2 proceedings 7:16 produced 79:10 98:8 102:22 133:10 proof 165:15 provide 177:9 provided 7:6 provocation 152:12 public 2:2 5:5 7:3 32:16 33:2 43:15 pulled 85:15 purpose 154:20 purposes 175:14 push 50:23 119:7 119:11 175:21 pushed 114:8 put 40:9 49:13,18 54:11,17 55:3,23 77:7 80:1 82:3 93:15 94:5 105:9 106:3 115:21 121:20 122:5,12 122:15 123:21 128:13 134:14 136:18 137:9,11 141:7 153:9 164:4 176:5 putting 102:5 P.C 5:9
P				Q
P 1:18 5:1,1 pack 105:5 175:13 175:17 176:12 package 105:1 packs 177:10,18 page 4:2 99:1 100:10 105:18,20 106:1,4,19,21 107:9,11,13,19 108:15 109:1 114:6 124:12 176:13 paid 17:9 130:22 Pamelor 104:4 paper 96:6 110:16 152:15,16,19,21 paperwork 38:17 95:9 138:4 Pardon 89:21 parents 158:23 Parole 89:21 part 21:23 46:21 53:6,8 62:10 75:4 75:19,20 90:21 176:3 particular 39:19 40:2 169:22 parties 1:21 2:22 179:17				question 137:1 165:11 175:9 questions 2:19,21 58:9 111:7 123:16 134:23 178:6 179:9 quick 62:15 quit 17:17
				R
				R 5:1 179:1 radio 25:18 29:1

38:1,3 ran 15:14 rank 13:19 19:15 19:19 20:4,10,15 20:18 razors 126:5 reach 67:2 read 58:5 reading 2:9 139:14 ready 14:6 really 19:16 20:16 23:10 24:4,6 31:2 46:14 63:11 65:22 76:12 91:20 92:6 125:23 169:9 reason 14:20 36:19 36:21 38:3 39:1 75:12 90:21 91:12 131:12,15 155:18 recall 156:1 157:14 157:16 159:23 received 98:5 105:15 141:9 receiving 104:18,19 recess 81:15 111:3 recollection 131:18 139:12 149:1 156:6 157:23 159:12 162:7 recollections 147:6 record 39:23 records 44:3 98:8 163:6,9 rectum 152:3 165:19 redo 15:1 reduced 179:10 refer 65:13 71:14 98:10 99:22 referred 151:11 refers 98:20 reflect 100:11 107:21 108:4 refrain 147:22	refuse 147:16 148:21 refused 148:9,14 148:15,19 160:22 regard 164:19 165:4,16 Regarding 170:3,5 regular 70:16 85:19 95:19 154:3 154:5,9,11 regularly 174:19 regulations 147:12 relate 135:8 relating 2:14 relation 48:11 release 61:14 relieve 31:14 39:8 relieved 40:7 41:14 relieving 41:4 remarried 9:2 remember 20:16 22:16,23 23:12 24:13 30:6 44:20 44:23 49:1 65:18 77:9 83:18,23 84:15 87:16 89:6 89:10,11 92:11 93:1 121:13,14,16 127:19,22 128:12 139:13 151:8 152:22 153:13,15 153:17 156:11 160:20 163:20 164:1,7,17 168:22 Repeat 165:11 repeated 156:13 repeatedly 114:8 156:3 replacements 17:17 reply 136:4 141:10 report 25:21 79:11 79:17 80:2,13 81:3,19 83:8,9 86:4 93:9 122:23	123:4,14 124:5,14 173:22 Reporter 7:2,18 reports 26:1 82:22 118:2 122:21,22 132:2 represents 179:12 request 4:16 133:20 134:19 135:18 required 122:20 respective 1:22 117:9 respond 136:6 139:16 146:3 responders 173:10 response 136:10,23 137:2,3,4,6,21 138:11 139:20,22 140:4,20 141:3 responses 138:6 responsible 36:6 40:23 79:13 81:20 102:5 104:17 117:8,21 rest 32:16 64:21 92:11 108:21 restroom 33:2 result 179:18 retake 15:1 retired 90:1 reviewed 30:9 reviews 95:8 136:20 Rhett 10:5 11:4,5 ribs 149:8,10 157:3 Richard 5:8 103:15 RICKY 1:12 rides 151:1 right 12:3,9,9,10 17:18 22:23 29:12 32:17,19,20 33:6 34:3,7,7 40:19 42:2,5,12 43:13	45:1 48:17 49:4 52:13 54:16 55:20 56:18,21,22 59:20 59:23 60:1 64:2,7 64:10 69:3 70:12 73:23 76:3,5 84:1 84:9,16,16,19 94:18 99:7 103:8 106:22 107:6 108:7 109:17 112:5 116:10 118:6,22 120:16 126:17,23 130:2,6 130:11 147:18 149:16 150:1 155:12 174:8 177:1 right-hand 33:14 57:7 64:3 70:11 93:20 rings 115:7 road 89:1 116:2,8 118:14 Roberson 21:16 23:4 92:9 94:2,17 101:20 127:5 137:13 Rockford 2:5 7:11 12:3,5 177:2 roll 110:7 room 32:19 34:13 42:19,20,23 45:10 46:9 47:9,22 53:7 53:9 55:17 56:17 56:19,20 57:2 59:9,12,15 60:9 64:1,9 70:2,10 71:7 75:20 109:12 109:14 118:5,8,22 126:12,22 127:10 141:15 149:23 155:12,13 rooms 28:12 32:17 43:6 70:5 71:2	75:1,8 119:9,14 rotate 27:17 78:23 79:1 rotated 30:20 rotating 26:23 Route 11:16 Rule 7:6 rules 2:14 7:7 rumored 144:16,18 run 103:6 running 112:7 Russell 177:3,17 R-h-e-t-t 10:5 <hr/> S S 1:18,18 4:8 5:1 SAITH 178:8 sally 64:4,5,16 Sandra 2:1 5:4 7:1 179:22 sat 162:17 Saturday 27:3,8 177:4 saved 117:20 118:1 118:2 saw 171:19 saying 95:5 158:1 162:16 says 20:2 106:12 112:16 114:7 115:1,9 123:14 126:5 132:9 136:4 136:12 147:13 150:7 151:15 152:1,6,14,23 153:20 154:1,7,13 155:19 156:2 157:7 174:1,9 schedule 77:21 78:12 95:22 school 13:7,9 14:23 screen 29:2,15 screens 29:16 screws 69:8 Scroggins 10:12
---	--	---	---	--

se 24:7 42:23	separates 64:20	84:3,17 85:10,11	99:10 106:16	86:10,12 87:12,15
sealed 175:19	September 2:6 7:12	85:15,21 86:3,18	107:22 108:4	88:5,8,10,12,15
second 44:7 64:8	sergeant 13:20	86:21 91:4,15,17	signatures 93:21	88:20,23 89:5
64:10 105:18,19	series 133:11 135:4	93:15,17 94:6	103:17	90:6,12 92:9
106:18,20 140:22	serious 169:11,15	95:10,17,21	similar 47:22	93:11 94:15 95:4
secretary 32:10	set 31:17 38:15	116:21 117:2	sink 46:5,6 67:11	95:21 97:1 98:21
129:10	39:7 42:11 53:4	121:23 122:6,7,8	sir 8:9,21 9:12,15	98:22 99:3,6,11
secure 61:17,19	75:2 112:3 173:18	124:18,21 125:9	10:17 11:8,11,14	100:1 101:2,10,16
64:16 69:8	sets 77:21	125:21 146:15	13:4,17 15:5,17	101:17 102:20
secured 33:11,13	seven 12:13,14	156:22 159:21,22	15:21,23 16:5,12	104:16 105:14
34:4,5,14,15,20	30:21 36:2,4	161:10,14 162:2,4	18:8,21,23 19:3,5	106:10,15,18,20
35:12,16,18 37:7	severity 169:23	164:8 173:22	19:12 24:21 25:2	107:12 108:6
44:10 56:15 64:6	shakedown 55:8	shifts 26:4	25:5,10 26:6,9,12	109:3,9,22 110:22
64:8 69:5	shape 60:15	shift's 125:1	26:19 27:2 28:8	112:6,13,20
see 19:16 24:5	shave 147:5,17	shirt 20:1,4,12	30:11 31:7 32:7,8	113:10,17,22
28:20 46:7,11,17	149:2	shirts 20:11	32:14 33:3,9,19	114:1,19 115:13
46:19,21 47:1,5	shaven 147:14	short 85:17 92:16	34:1 35:15 37:10	116:7 117:10,13
47:10 82:6,23	sheet 96:2,3 102:10	92:17 93:2	37:15 38:12 39:20	117:16,19 118:7
83:11 84:19 85:5	102:12,17,19,23	show 86:20 91:1	39:22 40:3 41:21	118:11,15,18
86:22 90:19 97:19	103:16 175:17	94:10 107:2	42:9 43:16,21	119:1,4,8,13,19
98:9,22 100:12	176:6,11	133:10,23 140:2	45:3,11,16 46:4,6	119:21 120:9,13
102:22 103:14	sheets 4:10,14	141:2	46:10,13,16 47:12	121:14 122:3
107:6,12 108:6,7	shelves 54:14,16	showed 101:21	47:23 48:2,9,22	124:8,9 125:10
108:11,20 124:14	55:2 68:11	104:15	49:2,20 50:4,12	126:19 129:5,6,14
136:15 138:3,6	sheriff 18:4 19:7,8	shower 46:3 52:19	50:14,17 51:6,9	129:19,22 130:1,3
140:3,11,14	19:11 20:17,21	67:14 120:14	52:1,4,7,9,15	130:7,13,17,19
158:23 163:5	21:15 22:14,17,22	126:7,10,15,17	53:10,12,16,21	131:1,6,11,16,20
174:23	24:12 36:19 78:7	127:9	54:1,13 55:13	131:22 135:7
seeing 30:6 164:18	114:4 115:22	showing 107:3	56:22 57:3,19	136:7,11,14 137:9
seen 43:1 137:15	121:8 136:12	130:19	58:3,7,11,16,23	139:10,18 140:9
177:21	137:17,23 145:12	shown 86:3	59:2,11,13 60:20	141:4,8,21 142:22
seizure 171:20	166:12 174:7	shows 86:5 91:23	61:2,18,23 62:7	143:5,9,12 144:3
172:1,6,10,19,21	sheriff's 17:20,22	128:23 129:11,15	62:21 63:3 65:4	144:6,9,13,17,21
seizures 171:16,22	18:6,11 32:10	129:16 130:5,9,12	65:21 66:4 67:13	145:9,11,15,19,22
172:15,16	62:11 145:21	130:14 131:2,5,7	67:16 68:6,12	146:9,13,19,21
seldom 55:6	shift 20:7,8 21:5,8	131:9 138:20	70:19,19 71:1	147:7,12,19,22
self 143:19 173:3	26:3,7,8,11,14,16	shut 50:19 160:13	72:3,6,10,11,14	148:8,17,20
Selman 10:19	26:17,18,23 27:13	shuts 62:2	72:17 73:6,11	149:11,17,21
selves 25:22	27:14 28:2,3,5	sick 85:18 93:6	74:1,4,7,19 75:16	150:6,11,14,21
sense 101:12	30:3 36:12 38:20	side 32:8,11 54:7,8	75:17 76:17 77:2	151:13,20,23
sent 105:6 173:6	40:5,22 41:1,4	55:22 57:7 64:3	77:13,20 78:10,22	152:5,9,17 153:3
separate 75:15 96:4	79:11,16,21 80:2	70:11	79:1,12 80:5,8,10	153:6,12,15,19,23
separated 9:6 60:3	80:12,18 81:6,19	sign 110:6 117:11	81:4,23 82:12	154:6,12,17
84:21	81:22 83:1,8,9	signature 2:10 94:4	84:21 85:4 86:6	155:17 157:1,6,10

157:13 158:3,8,10 158:12,18 159:2,8 159:19 160:5 161:18 162:13,21 163:3,8,16 164:17 165:14 166:1,14 166:19 167:6 168:12 169:6,20 170:12,14 171:3 171:20 172:5,17 172:18,19,23 173:19 174:20 sit 39:14 43:3 46:22 52:14 54:6,9 116:11,14 171:12 sits 32:18 33:7 68:3 sitting 28:21 36:8 40:12 51:3 170:23 six 13:11 16:15 17:14 26:19,20 30:21 35:23 102:16 112:18,21 113:5 126:5 sixteen 65:8 132:9 six-month 23:23 size 49:14 65:3 71:21 slapped 152:7,8 sleep 153:1 sleeping 153:5 slot 24:8 small 29:16 51:16 52:9 smaller 53:7 65:5 70:10 Smith 5:9 9:1 10:16 socialize 143:23 somebody 27:19,23 31:13 36:23 64:14 77:16 85:17 95:14 161:11,13 son 9:21 10:3 sons 9:13 soon 32:8 33:12	44:8 57:19 64:7 sorry 108:12 160:12 165:12 sort 22:2,12 23:10 32:18 52:11 60:14 85:13 93:4 109:14 123:12 151:6 SOUTHERN 1:3 space 60:12 speak 145:17 specific 39:7 40:10 96:15 162:15 specified 93:17 speed 150:16,18,20 151:12 spell 88:3 spent 14:4 spigot 155:14 split 38:19 45:4 spoken 144:23 spring 22:20 71:6 square 68:20 stacked 47:20 52:4 staff 36:18 116:19 135:20 144:1 170:15 stainless 66:15 stair 50:9 staircase 50:10 stall 46:3 52:19 stand 8:13 110:14 standard 78:13 93:12 150:23 standing 20:6 63:23 start 79:16,20 91:16 113:11 started 79:19 starts 125:5 state 2:2 7:3 14:22 15:4,7,11 17:10 179:3 stated 114:11 STATES 1:1	stationed 15:7 stay 38:22 41:5 55:18 56:4 79:4 Stayed 13:10 stays 28:14 72:20 steel 66:16 stenotype 179:8 Stephen 94:12 steps 31:18 42:11 53:4 Steve 22:12 23:12 85:8 138:9 stick 67:6,9 165:18 sticks 52:12 STIPULATED 1:20 2:8,16 3:4 stipulation 7:8 stipulations 7:19 Stockham 4:3 5:8,9 8:7 69:23 81:7,17 98:12 103:20 104:1,5,11,12 110:23 111:5,14 112:1 124:19,23 125:2 128:21 132:16,20,23 133:3,9,18,22 134:8,11,14,17 136:2 138:19 142:11 167:10,14 167:22 168:4,7 170:5 173:17 175:4 store 105:7 176:1 176:23 stores 177:4 stout 62:16 Stover 22:10 straight 32:15,21 34:2,10 41:11 43:13 44:6 48:17 57:4,11 64:1,11 street 2:5 7:11 12:12	Stroud 83:17,22 84:5,22 88:9 143:2,21 struck 146:8 150:12 154:13,15 164:20 structure 20:5,10 20:15,19 stuck 152:2 165:17 student 10:9 13:8 stuff 54:17,19 55:3 126:12 styrofoam 158:11 sued 18:22 suffer 77:14 suffered 143:13 171:16,22 suicidal 163:23 Suite 5:11 summary 128:23 Sunday 27:4,8 supervision 179:11 supervisor 16:6 20:7,9 21:8 22:4 27:20 78:1 94:14 95:3,6,8 137:20 141:12 supervisors 21:6 22:18 24:15,17 82:5,16,21 87:21 94:6 supper 100:2,7 supply 155:12 support 163:6 165:23 166:2 supports 165:20 supposed 112:4 121:19 122:9,11 sure 22:14 23:9,13 24:4 31:1 49:16 77:16 95:9 97:10 97:23 111:9 136:21 146:5 167:22,23 173:2	surrounding 143:7 Susan 9:1,14,16 10:16 Suzanne 9:20 swallow 98:1 swap 27:18 sworn 7:23 system 145:6 T T 1:18,18 4:8 179:1 179:1 table 51:16 52:8,10 52:12 53:23 54:2 54:4,5 tables 43:3,9 tagging 85:6 take 21:22 25:21 36:23 55:14 69:6 74:2,5 75:3 78:15 85:18 97:22 105:8 110:1 111:1 126:9 126:16,23 127:7 152:15 153:22 158:16 175:2 177:2 taken 2:1 41:16 79:17 81:15 97:21 101:3 111:3 170:18 179:7 takes 73:17,20,21 76:5 talk 23:16 talked 166:9 talking 25:8 29:7 33:21 60:13 75:22 86:8 123:1 170:23 Talladega 83:20,21 89:7,18 Tallapoosa 15:9 tape 29:22 30:1 tapes 29:21 30:2,6 30:13 31:4 taught 104:13 Taylor 86:23,23
--	--	--	--	--

87:1 89:23 90:2,3 91:7 teach 102:1 tear 69:6 teeth 150:9 165:5 telephone 25:18 telephones 43:6,10 tell 8:15 24:19 30:4 32:3 38:6 47:13 58:12 59:14 70:6 79:6 98:11,19 100:10,23 124:11 127:6 140:3 163:22 166:23 170:10,16 171:5 171:15 telling 70:17,21 temperature 73:13 155:20,23 temporary 16:19 ten 40:18 42:3,14 47:19 48:23 65:6 65:11,20 116:16 120:16 138:21 174:1,9 terminated 15:22 terms 13:21 Terry 6:2 94:1,19 137:13 test 15:1 145:4 testicles 151:17,19 151:22 testified 8:1 Thank 178:2 thereto 3:3 179:9 thermostat 72:22 73:3,7,9,15,17 74:16,20,21 75:2 75:15 76:11,16,19 thermostats 73:1 74:9 76:1 they'd 39:12 thigh 151:5 thing 19:13 23:11	39:6 63:9 85:11 93:5 95:11 151:6 things 80:14,21 86:2 146:2 think 9:10 20:20 30:23 44:18 63:7 65:15 77:5 95:23 96:6 108:7 110:23 116:15 131:13 148:13 166:22 third 95:5 107:8 thirteen 11:1,3 thirty-six 68:3 Thomas 9:20 thought 57:1 threaten 158:21 three 9:12,13 21:5 27:9 34:22 35:6,7 44:21 49:23 50:2 50:5 52:23 53:5 55:22 90:15 91:5 91:15 93:21,22 99:16 102:16 112:15 113:2 115:2 121:17 133:4,6 156:21 174:4 throw 66:9 thumb 108:10 Thursday 27:5 till 14:17 41:5 127:16 174:3 177:7 Tim 40:7 83:13 time 2:23 3:1 4:14 11:2 14:2 16:4 17:5 18:7,15 20:22 21:11,16,18 21:22 22:5,10 23:7,11,16,17,23 24:1,6,11,22 25:7 25:12 29:23 30:7 30:14 31:17 39:7 39:19 40:2,5 55:9	58:8,10,20 59:4 61:22 72:21 75:22 78:4,21 79:7 81:21 82:7,15,23 84:10 85:9,14,16 91:14 92:16,18 93:2 94:17 96:9 96:16 97:20 99:2 99:23 100:6 102:8 109:11 110:2 111:1 112:9,12,23 113:20 114:10 115:11 120:4,12 120:22 122:16 125:17 131:19 137:12 138:21 140:16 143:4 145:3 151:4 154:9 154:11 156:11 162:10,15 163:17 164:6 166:8 167:21 168:3 169:23 172:2,9 177:21 times 11:7 21:19 38:16 40:13 99:16 100:4 156:21 167:16 177:5 today 11:13 20:2 23:17 39:3 toilet 46:4,12 52:19 54:18 66:2 70:20 152:15,16,18,21 toiletries 127:13 told 41:17,19 57:1 57:22 60:23 63:1 70:3 81:18 105:7 123:3 127:2,4 128:9 142:12 143:10 147:5 153:1 160:13 168:13,15,20 169:3 171:21 top 22:23 28:19	29:12 42:2,5 45:1 49:4,23 50:2,5,8 52:5,6 53:1,2,3,6 54:23 65:22 70:10 82:13 84:1 91:5 93:7 99:14 116:10 124:20 125:14 162:8 176:3 total 36:4 tour 118:20 tower 4:12 25:15 27:17 28:7,9,10 30:19 31:9 34:22 35:4 36:9 37:9,14 38:10,14,23 39:8 40:1,7,12,15,21 41:12,13 43:20,22 44:2 51:3,5 74:10 74:11 76:1 79:11 79:20,21 80:2,13 80:17,17,19,23 81:18 86:17 93:9 93:14,16 95:16 111:11 112:2 114:21,23 115:1,3 115:5,8,12 119:12 124:13,18 125:1,7 125:21 132:2 161:20 trained 101:18 trainees 90:18 92:8 training 91:10 transcript 179:13 transport 36:22 trays 97:7,12,13 treated 145:7 Trey 11:1 trial 3:1 tried 46:15 67:5 152:2 165:18 trooper 17:5 troopers 14:22 15:3 15:4,11,13 16:7 true 58:22 90:11	153:2 159:1 161:21 165:4 179:12 trustee 120:6,8 trustees 55:18 56:4 56:5 97:2,4,6 112:17 120:21 121:4,9,13 try 38:19 trying 37:6 44:19 Tuesday 27:4 turn 33:14 59:18 59:20,21 60:1 77:5 turned 10:22 25:22 77:17 145:4 turnover 79:2 TV 29:4,6 43:4,12 twelve 11:2 26:18 28:3 29:11 65:7 83:10 85:21 112:9 132:9 158:6 twenty 60:15 139:2 174:9 twenty-four 29:22 twenty-one 11:5 112:11 115:19 116:4 twenty-two 113:12 113:19,21 114:9 114:18 115:10,19 116:4 two 9:15 10:15 12:17 17:16 22:3 26:4 27:10,15 28:2,4 36:15 39:18 43:4,5 44:19,21 45:8 46:14 49:23 50:2 50:4 51:15,16,23 53:19 59:7,13 63:1 64:6 65:17 72:1 84:9 90:14 99:9 102:16 106:4
---	--	--	--	--

111:15,21 112:15 112:18,18,21,21 113:4,4,7,7,8 116:22 117:3,7,7 120:1,2 132:5 138:20 156:21 157:3 161:15 174:4,4,4,4,9,10 174:11,12,12,21 174:21 type 39:6 56:10 66:5 80:6,7 85:11 93:5,13 95:10 122:23 123:8 151:6 155:12 typewriting 179:10	126:13 176:15 Usual 7:18 usually 92:14 utility 166:21 U.S 12:7	wanted 14:3 25:20 126:15 175:9 wanting 160:15 wash 155:2,7,10 158:16 washed 66:11 155:3,4 158:19 159:4,6 wasn't 39:11 58:6 85:23 92:5,19,19 101:3,7 126:18 127:18 174:23 watch 43:4,21 164:3,5 watched 155:9 watching 159:7 water 72:4 155:14 157:8,9,15,18,19 157:21 160:7,18 160:22 161:2 way 28:19,21,23 31:21 40:19 41:15 47:20 49:10,12 50:15 53:14 60:4 67:21,23 68:1,5,7 71:23 100:23 101:13 105:4 115:15 125:16 135:1 161:2	137:13 162:1,11 174:6 went 13:7,8,13 15:2 16:10 17:19 82:7 85:11 127:12 weren't 120:11 147:11 163:2 we'll 110:3 we're 20:10,13 25:8 27:2 61:8 62:11 111:8 we've 29:13 71:12 82:20 90:9 116:18 whatsoever 132:4 152:13 white 164:11,14 Whitehead 21:20 wide 68:4 widest 60:16 Willford 5:20 7:20 132:18,21 133:1 165:8 173:19 178:5 William 18:4 Wilson 6:2 20:18 21:15 22:14,17,22 24:12 78:7 94:1 114:4 137:14 166:12 window 33:5 47:1 60:6 68:16,18 164:12 windows 28:18 68:14 wintertime 72:23 witness 2:11 7:14 69:15,22 103:5,9 103:13 140:5,11 142:4 172:11 178:4 179:14 woman 84:12 women 42:15 45:12 48:7 50:1 53:11 word 164:21	wore 22:3 151:4,7 work 13:3,13 14:14 15:2 17:10,12,19 17:23 18:2 24:23 25:3,5 26:10 27:3 27:5 39:15 56:6 60:23 61:1,10 74:17,22 76:2 78:14 83:18 85:19 85:21 86:9 87:3,8 89:1 90:10,20 91:12 92:21 93:4 95:14 116:2,8 117:22,23 144:2 144:11 166:4 worked 15:8 18:5 20:8 25:8,15 26:13,15,23 30:8 85:10 87:2,9 92:14,15 129:12 129:17 130:9,15 131:3,8 working 17:2 31:8 36:20 39:16 56:10 61:5 76:21,22 78:20 79:15 82:14 82:23 86:20 87:20 91:18,23 92:5 93:18 94:5,16 95:1,10 102:8 113:2 114:23 116:21 142:21 143:3 146:12 149:16 162:2,3,9 166:8 workings 75:11 works 10:9 38:20 76:3 83:14,20 84:3 85:8 89:20 89:21 90:8,23 worry 142:8 wouldn't 97:2 101:6,9 108:22 158:23 169:14
U U 1:18 uh-huh 29:3 50:12 94:23 106:22 126:8 Uh-uh 87:15 133:21 uncuffing 61:12 understand 112:3 116:5 169:8,10 170:21 understood 118:4 undo 83:16 unit 119:23 UNITED 1:1 units 74:15 unlock 31:20 unlocked 31:23 32:2 upper 126:2 upstairs 28:11 31:13,16 37:3 39:11 79:22 115:8 urinal 66:6 urination 66:8 use 20:9 43:17,22 101:19 110:8 112:4 123:9	V vacation 78:15 95:15 129:21 130:5 varied 120:23 varies 117:5 vent 72:8,12,18,19 72:20 73:6 76:4 vents 72:14 verbal 137:3,4 138:11 verbally 139:17 video 70:17 visitation 33:23 34:1,8,13,19 36:1 44:8 55:19,20 76:14 147:11,16 148:2,10,14,22 149:6 voluntarily 15:19 16:1 145:3 vs 1:9	W wait 104:1 168:2 waiting 20:11 111:8 waived 2:11 3:7 walk 31:17 41:5 walking 60:4 wall 38:6 43:7,12 43:13 45:5,6,7 52:2,10 54:15 64:20 67:20 68:2 68:9 71:3 want 23:16 37:17 38:7,22 39:13 95:7 135:11,12 146:2	wear 20:13 wearing 20:1 wears 150:16 Weaver 174:22 WEBB 5:21 Wednesday 27:5 week 11:3,3 27:11 128:23 130:4 172:22 weekend 27:6,9 Wendy 21:16 22:11 22:17 23:4 24:12 78:6 85:14 94:1 94:16 101:20 104:13 127:5	

172:22 wrap 152:19 wrapping 152:21 write 122:21 123:3 136:4 137:5 writes 81:2 writing 125:15 139:8,13 written 115:16 122:14 125:13 137:2,5 148:6 wrote 136:10	10:40 2:7 7:13 1005 5:17 111 4:11 114 5:11 12 139:19 12th 100:15 107:17 131:8 12-1-03 136:13 12-10 139:23 12-18 138:15 12-18-03 173:21 12-21 139:23 12-21-03 139:21 12-7 140:1 13th 100:16 107:17 130:10 133 4:13,15 14th 100:16 130:10 15th 109:3 153A 11:16 16 107:17 16th 101:8 106:6 106:13 107:10 109:4 111:12 127:16 167:18 168:9 17 107:18 17th 100:16 130:10 175-178 4:4 18 107:18 18th 100:16 130:11 19th 109:4 1956 8:19 1974 13:6 1980 13:14,16	101:5 120:3 168:8 170:19 2004 22:20 23:21 58:2,18 86:4 120:4 124:16 168:9 170:20 2007 2:6 7:13 21 107:18 22 107:18 22nd 100:17 130:15 2204 5:10 23rd 100:17 130:15 231 12:7,9 24th 109:4 25th 2:6 7:12 109:4 130:15 26 107:18 26th 100:17,19 130:16 27 129:1 27th 100:17,19 107:18,20 129:12 28th 100:17,19 107:23 109:5 129:12 29th 107:15,23 108:10,13 109:5 131:3 136:9	4 4 4:15 4th 99:7,9,17 100:14 108:19,20 131:4 5 5th 107:4,14 129:17 6 6th 107:4 129:17 7 7 11:16 7th 107:17 108:6 7475 5:22 8 8th 99:12 100:14 107:10 108:6 131:8 8-175 4:3 80 14:17 81 13:2 84 14:18 85 15:3,4,16 86 10:2 9 9th 99:13,16 100:15 108:3 129:2,23 131:8 91 15:12,16,18 93 9:5 95 9:6 96 9:5,7 97 17:18 98 4:9 17:18,21
X X 4:1,8 Y yeah 42:13 94:21 96:4 104:21 107:1 108:8 118:1 139:4 164:15 168:4 year 143:22 years 9:9 12:13,14 12:17 13:11 14:5 14:19 16:15 17:14 63:8 y'all 176:15 177:10 Z zero 145:5,5,5 0 03 19:9 167:17 04 94:23 1 1 4:9 86:4 1st 94:21,22 104:10 106:6,12 107:3 108:3,16 129:13 1-12-04 132:6 1-5-04 125:7 1-6 125:20 140:15 140:17 1-9-04 91:22	2 2 4:11 2nd 108:5 111:12 124:15 2:50-CV-01150-... 1:10 20th 109:4 2003 22:19 23:18 58:2,17 83:11	3 3 4:13 3rd 100:13 104:6 108:5,19,19 131:4 3-15 8:19 30 7:6 30th 107:21 108:1 108:10,13,17 109:5 131:3 31st 100:18,19 129:12 35136 2:5 7:12 35209 5:12 35216 5:18 36124 5:23	